

**IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

Rutherford & Gallman,)	
)	
Plaintiff,)	Case No. 18-cv-10706-AEK
)	
v.)	Hon. Andrew E. Krause
)	United States Magistrate Judge
City of Mt. Vernon, <i>et al.</i> ,)	
)	
Defendants.)	JURY TRIAL DEMANDED
)	

EXHIBIT 8



CASE NO. 1:20-CV-9251

ALAN SEWARD

V.

DET. CAMILO R. ANTONINI, ET AL.

DEPONENT:

DET. CAMILO R. ANTONINI

DATE:

January 03, 2022



schedule@kentuckianareporters.com

877.808.5856 | 502.589.2273

www.kentuckianareporters.com

1 IN THE UNITED STATES DISTRICT COURT FOR THE
2 SOUTHERN DISTRICT OF NEW YORK
3 CASE NO. 1:20-CV-9251
4 HON. KENNETH M. KARAS
5 UNITED STATES DISTRICT JUDGE

6
7 ALAN SEWARD,
8 Plaintiff

9
10 V.

11
12 DET. CAMILO R. ANTONINI, ET AL.
13 Defendants.

14
15
16
17
18
19
20
21
22
23 DEPONENT: DET. CAMILO R. ANTONINI
24 DATE: JANUARY 3, 2022
25 REPORTER: AALAYAH PURNELL

<p>1 APPEARANCES</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFF, ALAN SEWARD:</p> <p>4 Heather Lewis Donnell</p> <p>5 Loevy & Loevy</p> <p>6 311 North Aberdeen Street</p> <p>7 Third Floor</p> <p>8 Chicago, Illinois 60607</p> <p>9 Telephone No.: (312) 243-5900</p> <p>10 E-mail: heather@loevy.com</p> <p>11 (Appeared via videoconference)</p> <p>12</p> <p>13 AND</p> <p>14</p> <p>15 Angela Perkins</p> <p>16 The Law Offices of Jarrett Adams</p> <p>17 40 Fulton Street</p> <p>18 Floor 23</p> <p>19 New York, New York 10038</p> <p>20 Telephone No.: (646) 880-9707</p> <p>21 E-mail: angela@jarrettadamslaw.com</p> <p>22 (Appeared via videoconference)</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 2</p> <p>1 APPEARANCES (CONTINUED)</p> <p>2</p> <p>3 Also Present:</p> <p>4 Krystal Barnes, Videographer</p> <p>5 Alan Seward, Plaintiff</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p>1 APPEARANCES (CONTINUED)</p> <p>2</p> <p>3 ON BEHALF OF THE DEFENDANTS, DETECTIVE CAMILO R.</p> <p>4 ANTONINI, POLICE OFFICER ROBERT F. PUFF, DETECTIVE</p> <p>5 SERGEANT SEAN J. FEGAN, UNIDENTIFIED MOUNT VERNON POLICE</p> <p>6 DEPARTMENT EMPLOYEES AND OFFICERS, THE CITY OF MOUNT</p> <p>7 VERNON, POLICE OFFICER MICHAEL HUTCHINS, POLICE</p> <p>8 COMMISSIONER GLENN SCOTT, POLICE OFFICER RAVIN PALMER,</p> <p>9 POLICER OFFICER PATRICK KING, POLICE OFFICER JOSPEH</p> <p>10 VALENTE, SERGEANT JOSE QUINOY, POLICE COMMISSIONER SHAW</p> <p>11 HARRIS, POLICE OFFICER SEBASTIAN SALAZAR, AND POLICE</p> <p>12 OFFICER ROBERT F. KRESSMAN:</p> <p>13 Steven Bushnell</p> <p>14 Marykate Acquisto</p> <p>15 The Quinn Law Firm</p> <p>16 399 Knollwood Road</p> <p>17 Number 220</p> <p>18 White Plains, New York 10603</p> <p>19 Telephone No.: (914) 997-0555</p> <p>20 E-mail: sbushnell@quinnlawnny.com</p> <p>21 macquisto@quinnlawnny.com</p> <p>22 (Appeared via videoconference)</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 3</p> <p>1 INDEX</p> <p>2</p> <p>3 PROCEEDINGS</p> <p>4 DIRECT EXAMINATION BY MS. DONNELL</p> <p>5</p> <p>6 EXHIBITS</p> <p>7 Exhibit</p> <p>8 2 - Municipal Policy 3.045</p> <p>9 5 - Detective Division Standard Operational</p> <p>10 Procedures 2015</p> <p>11 9 - Incident Report</p> <p>12 11 - Felony Complaint</p> <p>13 15 - [MARKED IN CONFIDENTIAL PORTION]</p> <p>14 16 - [MARKED IN CONFIDENTIAL PORTION]</p> <p>15 24 - [MARKED IN CONFIDENTIAL PORTION]</p> <p>16 13 - Defendant's Limited Disclosures</p> <p>17 *26 - Video</p> <p>18</p> <p>19 *WILL FORWARD UPON RECEIPT</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 10</p> <p>1 A Take the what? I'm sorry.</p> <p>2 MR. ACQUISTO: Because --</p> <p>3 Q I'm not sure how that happened --</p> <p>4 MS. ACQUISTO: I'll actually just take a look</p> <p>5 at it, because I know when you --</p> <p>6 THE WITNESS: Oh, the thumbs up?</p> <p>7 MS. DONNELL: It's off now.</p> <p>8 MS. ACQUISTO: It is? Oh, it's off.</p> <p>9 MS. DONNELL: It was just -- the thumbs up</p> <p>10 sign.</p> <p>11 MS. ACQUISTO: When you get sworn in and you do</p> <p>12 it, then it, like, has a thing.</p> <p>13 MR. BUSHNELL: Oh, okay.</p> <p>14 BY MS. DONNELL:</p> <p>15 Q I was like, maybe your verbal answers --</p> <p>16 verbal answers, not Zoom emoji answers for me. Okay. So</p> <p>17 Detective Antonini, how many times -- have you been</p> <p>18 deposed before?</p> <p>19 A Yes.</p> <p>20 Q On how many prior occasions have you sat for</p> <p>21 your deposition?</p> <p>22 A Can't recall.</p> <p>23 Q Are you able to estimate how times?</p> <p>24 A I want to say probably less than five, maybe.</p> <p>25 Q Okay. So somewhere -- five or less, you've</p>	<p style="text-align: right;">Page 12</p> <p>1 Q Did you review -- well, I'm going to ask you</p> <p>2 some questions about what you did to prepare for your</p> <p>3 deposition today. But I just want to be clear; I'm not</p> <p>4 asking you to divulge or disclose any of your</p> <p>5 communications with Steve, or Marykate, or any of your</p> <p>6 other lawyers; is that clear?</p> <p>7 A Yes.</p> <p>8 Q Okay. So did you -- first of all, did you</p> <p>9 meet with your attorneys to prepare for your deposition?</p> <p>10 A Yes.</p> <p>11 Q How many occasions did you meet with your</p> <p>12 attorneys to prepare for today?</p> <p>13 A I'll say, maybe twice.</p> <p>14 Q Okay. Were those in person meetings?</p> <p>15 A Yes.</p> <p>16 Q And how long ago was the first meeting that</p> <p>17 you had with your attorneys to prepare for today?</p> <p>18 A I wasn't timing it.</p> <p>19 MR. BUSHNELL: She's asking you when. When was</p> <p>20 it?</p> <p>21 A When was it? Prior to the new year.</p> <p>22 Q Okay. Was it prior to Christmas?</p> <p>23 A Yes.</p> <p>24 Q And how long was that meeting?</p> <p>25 A I wasn't timing it. I'm sorry.</p>
<p style="text-align: right;">Page 11</p> <p>1 been deposed; is that right?</p> <p>2 A Five or less.</p> <p>3 Q Okay. And in those five or less depositions,</p> <p>4 were those all involving lawsuits that were inquiring</p> <p>5 into your work as a Mount Vernon police officer? Or did</p> <p>6 some of those cases have to do with some other -- like a</p> <p>7 private lawsuit outside your work?</p> <p>8 A Work related.</p> <p>9 Q Okay. And all of the prior depositions, have</p> <p>10 they been work related since your employment with the</p> <p>11 Mount Vernon Police Department?</p> <p>12 A Yes.</p> <p>13 Q Okay. Do you remember the names of any of</p> <p>14 those cases -- the plaintiffs in any of the actions</p> <p>15 where you've been deposed previously?</p> <p>16 A No, I do not.</p> <p>17 Q In all of the prior occasions when you've been</p> <p>18 deposed, were you a named Defendant?</p> <p>19 A Can't recall whether I was or I wasn't.</p> <p>20 Q Have you ever testified at a civil trial</p> <p>21 related to your work as a Mount Vernon police officer?</p> <p>22 So I'm not asking about criminal trials, but any civil</p> <p>23 cases?</p> <p>24 A I don't recall ever testifying in a civil</p> <p>25 trial.</p>	<p style="text-align: right;">Page 13</p> <p>1 Q Was it more than an hour?</p> <p>2 A Just about an hour, give or take.</p> <p>3 Q Okay. And that was the first meeting you</p> <p>4 recall having, preparing for your deposition, correct?</p> <p>5 A Maybe -- yes.</p> <p>6 Q And that was so time before Christmas -- was</p> <p>7 it in the month of December?</p> <p>8 A One of them. Yes.</p> <p>9 Q And that meeting, you'd estimate was</p> <p>10 approximately an hour long?</p> <p>11 A Give or take.</p> <p>12 Q Did you look at any documents during that</p> <p>13 first meeting you've just testified to?</p> <p>14 A Yes.</p> <p>15 Q Okay. What documents did you look at?</p> <p>16 A Reports.</p> <p>17 Q What kind of reports?</p> <p>18 A Department reports, anything that had possibly</p> <p>19 my name, reports that I wrote, or the complaints that</p> <p>20 were filed.</p> <p>21 Q And when you're saying, "Complaints that were</p> <p>22 filed," what are you referring to?</p> <p>23 A Complaints that were filed against me.</p> <p>24 Q Are you talking about citizen complaints that</p> <p>25 were filed against you?</p>

Page 14

1 A Correct.
 2 Q Do you recall any of the citizen complaints
 3 that you reviewed during your first meeting to prepare
 4 for your deposition?

5 A No.

6 Q I'm sorry, can you repeat that for me?

7 A No, I don't.

8 Q Do you remember how many citizen complaints
 9 you reviewed during your first meeting with your
 10 attorneys?

11 A I don't, sorry.

12 Q And when you said you reviewed police reports,
 13 what kind? Were those police reports related to the
 14 incident that's at issue in Mr. Seward's complaint?

15 A That is correct.

16 Q And then you reviewed citizen complaints that
 17 had to do with other individuals, correct?

18 A Correct.

19 Q Any other documents that you reviewed?

20 A No.

21 Q Did you look at any video or photographs?

22 A Video.

23 Q Okay. What video did you -- this was during
 24 the first meeting you reviewed some video; is that
 25 right?

Page 15

1 A It's the same video. Just --
 2 Q What do you mean it's the same video?
 3 A Video pertaining to this case.
 4 Q Okay. Did you review more than one video or
 5 just one video?

6 A The only video.

7 Q Okay. And describe the video that you
 8 observed?

9 A The video is of the search of the apartment.

10 Q Are you present in that video?

11 A My voice is, but I am present in that
 12 apartment. Yes.

13 Q Are you the one operating the video cam
 14 recorder?

15 A I am.

16 Q Okay. Prior to your meeting with your
 17 Counsel, sometime in December of 2021, where you looked
 18 at police reports, and citizen complaints, and watched
 19 the video from the search on First Avenue, did you have
 20 an independent recollection of the events that are the
 21 subject of this lawsuit?

22 A No.

23 Q Okay. So -- and as you sit here today -- when
 24 I'm questioning you today, do you have an independent
 25 recollection of any of the events pertaining to

Page 16

1 Mr. Seward's lawsuit? Or is your memory limited to
 2 what's in the documents and in the video?
 3 A Other than what was presented to me in the
 4 report and video, that particular incident didn't have
 5 any significance of me -- for me to remember it. There
 6 was -- other than me recording the apartment and --
 7 that's to the extent of my recollection of that
 8 incident.

9 Q Okay. So is it accurate to say that your
 10 memory of the events of November 7, 2017 is limited to
 11 what was -- how your memory was refreshed through the
 12 police reports you reviewed and the video you reviewed?

13 A Yes, pretty much.

14 Q Do you have a memory of any of the events of
 15 November 7, 2017, outside of what you read in the police
 16 reports or observed in the video?

17 A No.

18 Q And so looking at those documents and
 19 reviewing those videos did not refresh your recollection
 20 in any way, as to events that occurred outside of what's
 21 documented in the reports or in the video; is that
 22 right?

23 A That is right.

24 Q How about the second meeting you had with your
 25 attorneys to prepare for today in person meeting? When

Page 17

1 was that meeting?

2 A I don't recall a specific day.

3 Q Was it last week?

4 A No. Last week was Christmas.

5 Q Well, last week -- Monday was the 27th,
 6 Christmas was Saturday the 25th.

7 A I was on vacation. So no, it wasn't last
 8 week.

9 Q Okay.

10 MR. BUSHNELL: Heather, could we take one
 11 second, please?

12 MS. DONNELL: You want to take a break?

13 MR. BUSHNELL: Yeah, real quick.

14 MS. DONNELL: Sure. We can go off the record.

15 (OFF THE RECORD)

16 VIDEOGRAPHER: The time is now 10:14 a.m.

17 BY MS. DONNELL:

18 Q Okay. Now you can -- Detective Antonini, is
 19 there a prior answer you'd like to clarify?

20 A Yes. I will admit one prior time in
 21 preparation for this deposition. In regards to this
 22 case, yes.

23 Q Okay. And did you meet with your attorneys
 24 before the deposition commenced this morning?

25 A Yes.

Page 18

1 Q Did you look at any documents this morning?
 2 A Briefly reviewed through the documents. Yes.
 3 Q What documents did you look at this morning?
 4 A Same documents that were presented to me
 5 before.

6 Q And that means the police report from the
 7 November 7, 2017 incidents?

8 A Yes.

9 Q Did you look at the video today?

10 A No.

11 Q Okay. Have you had any -- again, so just to
 12 clarify, I'm not asking you to divulge or disclose any
 13 of your communications with your attorneys. But have
 14 you had any meetings with your attorneys, in which other
 15 of the defendant officers named in this lawsuit were
 16 present?

17 MR. BUSHNELL: Objection. Go ahead.

18 A I don't recall. Possibly, somebody coming in
 19 and me going out. Or the other way around, me coming in
 20 and the other person leaving.

21 Q Other than the conversations you've had to
 22 prepare for your deposition with your attorneys, have
 23 you had any conversations with any of your work
 24 colleagues about your deposition today or the subject
 25 matter of your deposition today?

Page 19

1 A No.

2 Q Okay. Are you aware of a federal
 3 investigation by the United States Department of Justice
 4 into the Mount Vernon Police Department regarding
 5 certain policies and practices? Do you have any
 6 knowledge or awareness of that investigation?

7 A I am aware. Knowledge of what they're
 8 investigating, no.

9 Q I'm sorry. Can you clarify the last part of
 10 your answer? You don't know what they're investigating?

11 A No.

12 Q So as you sit here today, you have no
 13 knowledge of what particular patterns or practices the
 14 United States Department of Justice is investigating for
 15 the Mount Vernon Police Department?

16 MR. BUSHNELL: Objection. You can answer.

17 A That is correct.

18 Q Okay. Is this -- I will represent to you that
 19 one of the things the Department of Justice is looking
 20 into is a pattern and practice of unlawful strip
 21 searches. Are you -- is this the first time you're
 22 hearing that?

23 A Is that the comment that was expressed on the
 24 news media outlets?

25 Q Well, I'm just asking you. Have you not had

Page 20

1 any awareness, that that's one of the patterns and
 2 practices the Department of Justice is investigating?

3 A I am aware that the Department of Justice is
 4 investigating the city of Mount Vernon. What they're
 5 investigating, I'm not -- you know, I'm not aware.

6 Q Okay. So then I'm just going to repeat my
 7 question. I'm going to represent to you that one of the
 8 things they're looking into is -- they're looking at and
 9 investigating the possible pattern or practice of
 10 unlawful strip searches by the Mount Vernon Police
 11 Department. Is this, right now, the first time you're
 12 being made aware of that?

13 A I was made aware of the Department of Justice
 14 investigating the seat of Mount Vernon Police Department
 15 through the same media outlets that, you know, I saw on
 16 the news. Nobody, you know, specifically or directly
 17 expressed anything in regards to me.

18 Q Okay. Okay. I just want to make sure that
 19 you're understanding my question. So my question is,
 20 because I've made a representation to you about one of
 21 the subject matters of the Department of Justice's
 22 investigation, is that clear to you?

23 A Yes.

24 Q Okay. And it has to do with a possible
 25 pattern and practice of unlawful strip searches by the

Page 21

1 Mount Vernon Police Department. Do you hear that?

2 A Yes.

3 Q Okay. My question to you is, is right now, me
 4 making that information available to you, the first time
 5 you're being made aware that that is one of the patterns
 6 and practices that Department of Justice is
 7 investigating?

8 A No.

9 Q Or did you know that before?

10 A I didn't know that before.

11 Q Okay. So it's correct to say this is the
 12 first time, here in your deposition, that you're
 13 learning that information?

14 A What I heard on the news when they, you know,
 15 came out and said what they were going to do.

16 Q Okay. And just to be clear, you told me
 17 earlier, you knew there was an investigation, but you
 18 didn't know the subject matter of the investigation,
 19 correct?

20 A Correct.

21 Q Okay. And then I made a representation to
 22 you, of a particular subject matter they are
 23 investigating related to unlawful strip searches, right?

24 A Yes.

25 Q And then my question is, is right now the

Page 22

1 first time you are learning that information? And I
 2 don't feel like I've gotten an answer quite -- whether
 3 it's clear to me, whether you're just learning that
 4 information for the first time now, or you knew about it
 5 earlier?

6 A When I learn -- the same. When I learned it
 7 on the news. When they came out and said it.

8 Q Okay. So --

9 MR. BUSHNELL: Maybe it would be more helpful -
 10 - can you ask him what he learned from the news
 11 report that you're referring to?

12 BY MS. DONNELL:

13 Q Sure. It sounded like -- I asked you if you
 14 had known any of this subject matter that the Department
 15 of Justice was looking into. And you said, no, you just
 16 generally knew about the investigation. Can you clarify
 17 for me, what you learned when you listened to the news
 18 report about what the Department of Justice was
 19 investigating -- your understanding of their
 20 investigation?

21 A Practicing policies that were -- you know,
 22 Mount Vernon -- the City of Mount Vernon Police
 23 Department were having at the time, or whenever this
 24 pattern was happening. And one of the patterns is
 25 illegal strip searches and anything to that nature.

Page 23

1 Q Okay. So then you did know that they were
 2 looking into a possible pattern and practice of unlawful
 3 strip searches when you listened to the news? That's
 4 when you became aware of that information, correct?

5 A I became aware when I heard the news.

6 Q Okay. Got it. So you knew that before your
 7 deposition today, correct?

8 A Yes.

9 Q Okay. Have you been interviewed by the
 10 Department of Justice for its investigation?

11 MR. BUSHNELL: Objection. Go ahead.

12 A No.

13 Q Have you -- do you have any awareness of
 14 whether the Department of Justice has sought to
 15 interview you?

16 MR. BUSHNELL: Objection. You can answer.

17 A No.

18 Q Okay. Do you -- have you retained Counsel,
 19 for purposes of the Department of Justice's
 20 investigation?

21 MR. BUSHNELL: Objection. You can answer.

22 A No.

23 Q Have you ever been interviewed the FBI, for
 24 your work as a police officer with Mount Vernon?

25 A No.

Page 24

1 Q Have you had any contact with the Southern
 2 District of New York US Attorney's Office?

3 A No.

4 Q Have you had any interviews --

5 MR. BUSHNELL: Sorry -- let -- let her finish
 6 her question.

7 Q Have you been interviewed by anyone from the
 8 Southern District of New York US Attorney's Office?

9 MR. BUSHNELL: In regard -- sorry -- can we --

10 Q In regard to your work as a Mount Vernon
 11 police officer?

12 A No.

13 Q All right. You became a sworn officer with
 14 the Mount Vernon Police Department in January of 2008;
 15 is that correct?

16 A That is correct.

17 Q Okay. Prior to that, you were employed with
 18 the NYPD -- the New York Police Department, right?

19 A Yes.

20 Q And is it accurate to say you were employed
 21 with the New York Police Department from January 9, 2006
 22 to January 3, 2008?

23 A Yes.

24 Q Okay. So it was just a little shy of two
 25 years, right?

Page 25

1 A Yes.

2 Q Have you ever been employed by any other law
 3 enforcement agencies other than NYPD and Mount Vernon?

4 A No.

5 Q Have you applied to join any other law
 6 enforcement agencies other than the New York Police
 7 Department and the Mount Vernon Police Department?

8 A While employed?

9 Q No. Just at any other time in your life, have
 10 you tried to -- have you made an application to any
 11 other law enforcement agencies other than those two?

12 A Oh, yes. LAPD, border patrol, DEA, to name a
 13 few, you know --

14 Q Yeah. What other ones? LAPD, border patrol -
 15 - that's for the US government?

16 A Correct. DEA. But this was all while I was
 17 still in the United States Marine Corps. So we're going
 18 back to possibly 2002, 2003.

19 Q Okay. How long were you active duty with the
 20 Marine Corps?

21 A Four years.

22 Q Three years?

23 A Four years.

24 Q Oh, four years. Sorry, I misheard you. What
 25 years were you active duty with the US Marine Corps?

<p style="text-align: right;">Page 26</p> <p>1 A December 1999 to December 2003.</p> <p>2 Q And what was the status of your discharge?</p> <p>3 A Honorably.</p> <p>4 Q Did you do any tours overseas?</p> <p>5 A Yes.</p> <p>6 Q Where did you serve?</p> <p>7 A Iraq.</p> <p>8 Q Did you do one or more than one tour in Iraq?</p> <p>9 A One tour.</p> <p>10 Q How long was your tour?</p> <p>11 A October 2002 to March or April 2003. One of 12 the two, or longer than that, if I recall.</p> <p>13 Q After you left the Marine Corps in December 14 2003, where did you work -- did you work before your 15 employment with the New York Police Department in 16 January 2006?</p> <p>17 A W.B. Mason.</p> <p>18 Q I'm sorry, you'll have to repeat that for me.</p> <p>19 A W.B. Mason.</p> <p>20 Q W.B. Mason? What is W.B. Mason?</p> <p>21 A W.B. Mason is a paper supply company.</p> <p>22 Q Where is it located? Or where were you 23 working for W.B. Mason?</p> <p>24 A At the time I was sta -- the company was 25 located in Secaucus, New Jersey.</p>	<p>1 military duty into a law enforcement career. But the 2 process was so long that -- you know, from me coming 3 back from war time, didn't have enough time for me to 4 transition into a law enforcement career. So my time 5 ended, and I had to pretty much just come back to New 6 York, stay with -- and find another job while I was 7 applying to NYPD.</p> <p>8 Q So it sounds like the agencies you mentioned 9 before, LAPD, border patrol, and DEA, you applied to 10 while you were active duty with the Marine Corps, 11 correct?</p> <p>12 A Correct.</p> <p>13 Q Did you also apply it -- to the NYPD, while 14 you were active duty with the Marine Corps?</p> <p>15 A I don't think so, no.</p> <p>16 Q Were there any other law enforcement agencies, 17 other than the three that you earlier testified to?</p> <p>18 A I can't remember, no.</p> <p>19 Q Okay. Were you offered positions with LAPD?</p> <p>20 A I had a formal interview, and right after 21 that, I believe it was -- you know, I had to wait a 22 little bit. The last thing I remember was having a 23 formal interview and then waiting for the call back. But 24 during, like, my end of, you know, contract with the 25 Marine Corps came in, so I couldn't stay in California.</p>
<p style="text-align: right;">Page 27</p> <p>1 Q Secaucus, New Jersey?</p> <p>2 A Yes.</p> <p>3 Q And what position did you have with the W.B. 4 Mason company?</p> <p>5 A I was a delivery -- delivery truck driver.</p> <p>6 Q How long were you employed by W.B. Mason as a 7 delivery truck driver?</p> <p>8 A As soon as I was discharged from the military 9 until I was hired by the NYPD. So it was pretty much my 10 waiting period for the hiring.</p> <p>11 Q When did you first apply to NYPD?</p> <p>12 A Oh, I don't -- I can't remember. It's a long, 13 long time ago.</p> <p>14 Q Was it a long time before you were employed 15 with them in 2006?</p> <p>16 A Oh, no. I want to say, probably a year prior 17 of being hired, give or take, somewhere around that time 18 frame.</p> <p>19 Q And was that the same time period that you 20 were also applying to the other agencies you mentioned? 21 The LAPD, border patrol, DEA?</p> <p>22 A No, I was applying to them, while I was still 23 employed -- while I was still inside the military.</p> <p>24 Q Okay. Did you--</p> <p>25 A I wanted somehow to transition from doing my</p>	<p>1 I just came back to New York. So the time between was 2 not close enough.</p> <p>3 Q Got it. Were you stationed out of San Diego 4 with the Marine Corps?</p> <p>5 A San Diego, California. Yes.</p> <p>6 Q Okay. How about border patrol? Did you get a 7 formal interview with border patrol?</p> <p>8 A I don't think so. I don't remember, no.</p> <p>9 Q How about the DEA?</p> <p>10 A No, they were looking for college, 11 unfortunately.</p> <p>12 Q Oh, I haven't even asked you that. Can you 13 describe for me your educational background? Do you 14 have a high school diploma?</p> <p>15 A High school diploma.</p> <p>16 Q When did you graduate? Or where did you 17 attend high school?</p> <p>18 A George Washington High School.</p> <p>19 Q Where is that located?</p> <p>20 A City of New York.</p> <p>21 Q Did you graduate from George Washington High 22 School?</p> <p>23 A Yes.</p> <p>24 Q What year?</p> <p>25 A 1999.</p>

<p style="text-align: right;">Page 30</p> <p>1 Q Okay. Have you attended any post-high school 2 classes in college?</p> <p>3 A No. Other than what I attended in the Marine 4 Corps.</p> <p>5 Q And what did you -- you mean like basic 6 training?</p> <p>7 A Basic training and supplemental training. That 8 was a college credit.</p> <p>9 Q What kind of college credit did you get? What 10 courses?</p> <p>11 A Can't remember that.</p> <p>12 Q Okay. So you were -- let's talk about your 13 employment with the New York Police Department. Did you 14 -- you wrote your swear in date was January 9, 2006; is 15 that right?</p> <p>16 A I believe so.</p> <p>17 Q Did you attend the academy -- the police 18 academy?</p> <p>19 A Yes.</p> <p>20 Q How long was that?</p> <p>21 A Roughly, six months, I think.</p> <p>22 Q Is that run by NYPD?</p> <p>23 A Yes.</p> <p>24 Q How much of the six months is classroom 25 coursework? Is that all classrooms for six months? Or</p>	<p style="text-align: right;">Page 32</p> <p>1 Q The Manhattan what task force?</p> <p>2 A Manhattan North.</p> <p>3 Q What is the Manhattan North Task Force?</p> <p>4 A It's sort of like a unit that's pretty much 5 tasked with responding to, like, major incidents, all 6 the hot zones throughout the whole northern Manhattan. 7 And they address -- I don't know, areas where they're 8 being -- you know, like, they have the most crimes.</p> <p>9 Q Is it a tactical unit? Or it's just a special 10 unit within patrol?</p> <p>11 A Special unit within patrol.</p> <p>12 Q Okay. And it sounds like you get called out 13 to incidents that might need additional patrol officers?</p> <p>14 A Correct.</p> <p>15 Q Is it a uniformed position?</p> <p>16 A At the time, yes.</p> <p>17 Q How long did you work for the New York Police 18 Department assigned to the Manhattan North Task Force?</p> <p>19 A All the way up to the -- my transfer to -- all 20 the way up to my resignation.</p> <p>21 Q So I was going to ask, you resigned from the 22 New York Police Department?</p> <p>23 A Yes.</p> <p>24 Q Why did you choose to resign from the New York 25 Police Department?</p>
<p style="text-align: right;">Page 31</p> <p>1 are you on the street for part of that?</p> <p>2 A All classroom.</p> <p>3 Q So it's six months of classroom?</p> <p>4 A Yes.</p> <p>5 Q And then you are assigned as a probationary 6 officer in the patrol division; is that right?</p> <p>7 A Yes.</p> <p>8 Q Where were you assigned as a probationary 9 officer in the patrol division of the New York Police 10 Department?</p> <p>11 A 23rd Precinct.</p> <p>12 Q And you'll have to tell me the geographic area 13 of the 23rd Precinct, because I'm not as familiar with 14 NYPD's precincts.</p> <p>15 A East Harlem.</p> <p>16 Q East Harlem? Thank you. Did you get through 17 your probationary period?</p> <p>18 A Yes.</p> <p>19 Q Where were you assigned after your 20 probationary period ended?</p> <p>21 A Soon after the 23rd Precinct, I was stationed 22 at the 26th Precinct, which is on the west side of 23 Manhattan -- Upper West Side. I was there for a brief - 24 - brief time. And then I was assigned to the Manhattan 25 North Task Force.</p>	<p style="text-align: right;">Page 33</p> <p>1 A In order to be hired by the Mount Vernon 2 Police Department.</p> <p>3 Q Why did you want to leave NYPD to go to Mount 4 Vernon?</p> <p>5 A Why?</p> <p>6 Q Yeah.</p> <p>7 A Better pay -- at the time it was better pay.</p> <p>8 Q Any other reason other than at the time it was 9 better pay for police officers at Mount Vernon?</p> <p>10 A No. Well, the purpose was to leave New York 11 City in order to come into the Westchester County.</p> <p>12 Q Okay.</p> <p>13 A It's better benefits, better pay. Everything 14 is better at the time.</p> <p>15 Q Okay. Is it different now? Is it -- you're 16 saying at the time, it was better benefits, better pay. 17 Is it different now? Does New York police get paid 18 better -- better pay now?</p> <p>19 A NYPD?</p> <p>20 Q Yeah.</p> <p>21 A Compared to City of Mount Vernon?</p> <p>22 Q Yeah.</p> <p>23 A I don't know how you want me to answer that.</p> <p>24 Q If you know. Well, you're saying at the time 25 -- at the time it was better pay, and I was just curious</p>

Page 34

1 if something has changed now where --

2 A Well, it's always changing, but you know, if
 3 you give a choice to somebody in NYPD right now, whether
 4 they would like to transfer out of there to another
 5 department? I don't think any cop will hesitate. So I
 6 -- obviously, you know, I'm speculating, but the
 7 sentiment between the younger generation police officer,
 8 they'd rather go to other departments that are better
 9 pay, less stress -- you know, you don't have to deal
 10 with a lot of interaction or -- you know, it is a whole
 11 different mentality.

12 Q Okay. When did you first apply to the Mount
 13 Vernon police department?

14 A So I was hired sometime in January, correct. I
 15 want to say six months prior to that, if I remember, I
 16 took the test.

17 Q Okay. Before we move on, I forgot to ask. Did
 18 you have -- are you aware of whether you had citizen
 19 complaints filed against you when you were a New York
 20 police officer? I'm sorry. What's that?

21 A That's a big zero. Never.

22 Q Oh, that's a zero. Okay.

23 MR. BUSHNELL: You got -- you've got to do
 24 verbal answers.

25 Q You have to give me a verbal answer.

Page 35

1 Otherwise, I -- the transcript -- Aalayah will -- needs
 2 your verbal answer. But okay, got it. So had -- you
 3 have awareness of -- did you have any disciplinary
 4 actions against you, while you were a New York Police
 5 Department officer?

6 A Never.

7 Q Okay. All right. So let's go back to Mount
 8 Vernon then. Okay. So you started with Mount Vernon, I
 9 have it January 8, 2008. Does that sound right to you?

10 A Give or take, yes.

11 Q Okay. Now when you became a Mount Vernon
 12 police officer, you -- did you have to go back to the
 13 academy?

14 A No.

15 Q Okay. Did you start right away then, as a
 16 patrol officer with the Mount Vernon Police Department?

17 A My probationary period was shorter than
 18 somebody that would've graduated from the Westchester
 19 County Police Academy.

20 Q Got it. But basically your time with the New
 21 York Police Department Police Academy, you were able to
 22 waive attending any academy at Westchester because you'd
 23 done six months with NYPD, correct?

24 A Correct.

25 Q Okay. Was there any additional training that

Page 36

1 you got on the policies and practices for the Mount

2 Vernon Police Department when you first started?

3 A The refresher into their own policies,
 4 department -- departmental policies at the time, yes.

5 Q How long was that -- what you're saying, like,
 6 refresher on the Mount Vernon police office -- Mount
 7 Vernon Police Department policies?

8 A In house training, I can't remember a specific
 9 time frame, but did I want to say probably a couple of
 10 weeks, maybe.

11 Q So you were in classroom a couple weeks,
 12 before you went out on the street?

13 A Correct. Yes.

14 Q Okay. And so somewhere between two to three
 15 weeks, you think?

16 A I can't remember the time frame, but the --

17 Q Were you at the police academy with other
 18 cadets being trained or were you getting --

19 A No.

20 Q -- individual training?

21 A It was the whole -- their graduating class at
 22 the time, plus I believe it was me and another
 23 individual that were NYPD transfers. So I can't
 24 remember the number of guys that they had graduated, but
 25 it was roughly somewhere in between 15, maybe 20

Page 37

1 altogether. And we were all being in-house trained at
 2 the time in Mount Vernon PD.

3 Q And that was being run by Mount Vernon PD?

4 A Yes.

5 Q I see. So it was --

6 A By their training unit.

7 Q I see. Let me just clarify. So for people
 8 who were new police officers, they got trained by
 9 Westchester County at the police academy and then you
 10 plus another individual transferring from NYPD, all of
 11 you came together for some additional classroom training
 12 by just Mount Vernon?

13 A Correct.

14 Q Okay. And that portion, the Mount Vernon
 15 portion, you think was approximately two to three weeks?

16 A Give or take. I can't remember the exact
 17 amount -- the exact time.

18 Q Okay. Do you recall any of the subject matter
 19 that you were trained on by Mount Vernon?

20 A It was pretty much all of their policies and
 21 procedures.

22 Q Do you remember being trained on how to
 23 conduct pat-down searches by Mount Vernon?

24 A I -- specific subjects, I don't remember.

25 Q Okay.

Page 38

1 A But I can tell you that it was all their
 2 practices, policies, everything that had to be Mount
 3 Vernon related was, you know, pretty much just given to
 4 us during that timeframe, so...

5 Q But -- oh, I didn't want to interrupt you.

6 Continue.

7 A Everybody that graduated from the academy was
 8 -- they graduated based on becoming a police officer.
 9 Nothing specific related to the Mount Vernon Police
 10 Department. Anything Mount Vernon Police Department
 11 related was given to us at the Mount Vernon Police
 12 Department in-house training.

13 Q Okay. But say -- let -- so, but as you sit
 14 here today, are you able to identify for me, based on
 15 your memory, any of the specific subject matter that you
 16 were trained on by Mount Vernon?

17 A Give you an example right now. How to use the
 18 -- how to use the Ten-codes, which is pretty much how do
 19 we use the codes on the radio. That was one of them
 20 that I can remember.

21 Q Okay.

22 A They taught us how the city of Mount Vernon is
 23 broken into sectors, how to respond on the radio, how --
 24 you know, what commands do we usually use, you know. And
 25 then, you know, they went into depth in regards to like

Page 40

1 A Manzione. I remember he was --

2 Q Manzione.

3 A Manzione. Yes

4 MR. BUSHNELL: M-A-N-Z-I-O-N-E.

5 Q Okay. Got it. Any other individuals that you
 6 recall as you sit here today? That -- even if they're
 7 retired.

8 A Joseph Cappuccilli was another one of the
 9 training officers.

10 MR. BUSHNELL: I don't know how to spell that
 11 one.

12 A I don't know how to spell his name.

13 Q I think -- I got it close enough. Cappuccilli
 14 -- Joseph Cappuccilli. Anyone else?

15 A I can't think of the other officer's name, but
 16 there was -- there were two officers -- was the
 17 Lieutenant Vincent Manzione. That's all I can remember.

18 Q Okay. Thank you. Again, obviously, I'm
 19 asking questions, some of this from a long time ago, so
 20 it's just to the best of your ability.

21 A Correct.

22 Q Okay. All right. So then, after you
 23 completed this, you know, refresher, however you've
 24 described it, but this time on Mountain Vernon's
 25 specific policies, were you given an assignment -- your

Page 39

1 policies, procedures, in regards to uniform, anything
 2 that, you know -- everything Mount Vernon related.

3 Q Okay. Did you, during this Mount Vernon
 4 training, get trained on Mount Vernon's policies and
 5 practices with respect to conducting custodial searches;
 6 if you recall?

7 A Correct. I don't recall, but I'm sure we did.
 8 Okay.

9 Q Well, I only want to know what you actually
 10 remember, so...

11 A So no, I don't remember. No.

12 Q Okay. And did you -- do you have a specific
 13 recollection of being trained on Mount Vernon's policy
 14 and practice with respect to conducting strip searches?

15 A I don't remember.

16 Q And how about the same question with respect
 17 to Mount Vernon's policies and practices with body
 18 cavity searches?

19 A I don't remember.

20 Q Okay. Do you remember any of the individuals
 21 who provided that training to you and the other
 22 officers?

23 A Yes, but they are long since retired. I mean,
 24 I keep -- but that -- those Lieutenant Vincent Manzione.

25 Q Vincent Manzione?

Page 41

1 first assignment with Mount Vernon Police Department?

2 A Patrol.

3 Q And were you initially a probationary officer?

4 A Be -- for a short period of time, yes.

5 Q Do you remember how long that period of time
 6 was?

7 A Everybody's -- I believe everybody's
 8 probationary period at the time was 18 months. I believe
 9 we had a six-month probationary period.

10 Q When you're saying six months, are you're
 11 referring to the other individuals that was coming with
 12 you from NYPD?

13 A Yes. There was only two.

14 Q Who was that other individual?

15 A Can't remember his name specific because he
 16 didn't last too long in Mount Vernon.

17 Q Okay.

18 A He transferred somewhere else.

19 Q Got it. Okay. So you were assigned to
 20 patrol, and you were probationary for approximately six
 21 months. Where were you assigned to patrol initially?

22 A Patrol. Uniform patrol.

23 Q Is Mount Vernon just -- have one division,
 24 like one patrol division?

25 A No. No, we have the patrol division, the

Page 42

1 detective division, the support services division. They
2 have the training unit.

3 MR. BUSHNELL: I think she's asking about
4 precincts.

5 Q I'm sorry. Precinct. Does -- is the patrol
6 division divided up into various precincts from Mount
7 Vernon?

8 A No, there's only one police department in the
9 City of Mount Vernon.

10 Q One police department. Is there one district?
11 Only one district for the whole city?

12 A Yes.

13 Q So there's just -- okay. And are there
14 different beats within that -- within -- sorry, let me
15 strike that. Let me just make sure I got this here. For
16 Mount Vernon, there's just one police department, one
17 police district. The city's not subdivided into
18 different stations or districts?

19 A No, it's 4.4 square miles. Only has one
20 police.

21 Q Okay. How many officers -- sworn officers,
22 does Mount Vernon have right now; if you know?

23 A I can't tell you a number to tell you the
24 truth. I -- roughly -- somewhere under 200.

25 Q Under 200? And is it -- do you -- does Mount

Page 44

1 Q Okay. And what was your next assignment?

2 A After that, I came back to Mount Vernon, was
3 assigned back to patrol for another six months, give or
4 take. And I believe I was then reassigned to the
5 detective division narcotics unit.

6 Q Did you have to make an application to be
7 assigned to the detective division narcotics unit?

8 A No.

9 Q Do you know how you got reassigned to the
10 detective divisions narcotics unit?

11 A Well, you have to -- in -- the department puts
12 out a notice saying any individual or any officer
13 willing -- just wants to be part of the detective
14 division, specifically the narcotics unit, submit an MV5
15 (phonetic) or, you know, request in order to be, you
16 know, looked at it or however we --

17 Q Did you submit -- I'm so sorry. I thought you
18 were done. Go ahead. Did you submit a request?

19 A I don't remember submitting a request in.

20 Q You -- okay. So you think you may have just
21 been reassigned without putting in the request?

22 A I don't remember. I don't recall putting in a
23 request. I was given the choice. They said, listen, we
24 like your -- you know, the way you handle yourself on
25 patrol, with your activity level whatnot, blah, blah,

Page 43

1 Vernon work in three shifts? Patrol -- does patrol work
2 in three shifts?

3 A Yes.

4 Q What are the shifts for patrol at Mount -- in
5 Mount Vernon?

6 A Midnight to 0800, 0800 to 1600, which is 4:00.

7 Q Is that second shift? That was first shift
8 was midnight to --

9 A The first shift will be the midnight shift.

10 Q Yep.

11 A Second shift will be from 0800 to 1600.

12 Q Okay.

13 A And the third shift will be from 1600 to 2400
14 hours.

15 Q Got it. Okay. So you were assigned -- how
16 long were you assigned as a patrol officer for the Mount
17 Vernon Police Department?

18 A I was assigned to patrol for six months. And
19 right after that I was sent to the Westchester County
20 Police Academy as a class counselor for six months. In
21 other words, to be sort of, like, a support or
22 instructor to the class academy attending the police
23 academy at the time.

24 Q Okay. That was for six months?

25 A Six months.

Page 45

1 blah. We'd like to extend an invitation to be part of
2 the narcotic unit. I said, okay, yes, sure.

3 Q When did you join the narcotics unit for the
4 Mount Vernon Police Department?

5 A Specific date, I don't remember, but I believe
6 the year was 2009. Give or take somewhere February,
7 January, somewhere there.

8 Q So it was approximately a year after you'd
9 been working with Mount Vernon Police Department?

10 A Yes.

11 Q Are you still a member of the narcotics unit?

12 A No.

13 Q Okay. How long did you serve in the detective
14 division, in the narcotics unit, with the Mount Vernon
15 Police Department?

16 A I want to say pretty much my whole entire
17 career.

18 Q Okay. I'm sorry -- but where are you assigned
19 now?

20 A I am assigned at the real time crime unit
21 attached to the Westchester County police department.

22 Q When did you get assigned to the real time
23 crime unit for the Westchester County Police Department?

24 A I want to say, it's coming up on a year --
25 close to a year now.

1 Q So sometime in January or February of 2021,
 2 you got reassigned?
 3 A I think it was February.
 4 Q Are you still -- you know, you're still a
 5 Mount Vernon Police Department police officer, but
 6 you're seconded over to Westchester County; is that
 7 right?
 8 A Correct.

9 Q But your paycheck and everything is still
 10 through Mount Vernon?

11 A Yes.

12 Q Okay. Did you put in a request for that
 13 transfer to the real time crime unit?

14 A Yes.

15 Q Why?

16 A It's -- it was a unit that I wanted to be part
 17 of.

18 Q Why?

19 A Because it involved not going out on the
 20 streets anymore.

21 Q Why didn't you want to go out on the streets
 22 anymore?

23 A You ever heard of this virus called
 24 Coronavirus?

25 Q I have.

1 a detective.
 2 Q Did you get designated a detective?
 3 A Yes.
 4 Q But what -- is that different than being given
 5 the promotion of detective, being designated detective?
 6 A Well, it's -- it is a promotion, but it's that
 7 designation. It's not something you have to take a test
 8 for.

9 Q I see. So you never took a test at Mount
 10 Vernon to become a detective, correct?

11 A No.

12 Q Any reason why you never took that test?

13 A Because there's no test to become a detective.

14 Q In Mount Vernon, there's no test?

15 A No, there's no test to become a detective in a
 16 lot of police departments. It's just a designation -- a
 17 designation.

18 Q A designation. I see. Did you -- when you
 19 get that designation, does your pay increase?

20 A Probably 25 cents a paycheck.

21 Q Okay. Not much. Okay. So -- okay. So let
 22 me see. So it sounds like you worked as a -- with the
 23 narcotic units of the Mount Vernon Police Department
 24 from approximately January or February 2009 to January
 25 or February of 2021. Does that sound about right to

1 A It's very contagious. No, listen, I -- I'm
 2 coming up -- I -- you know, I think I reached a point in
 3 my career where it's -- I want to try different stuff,
 4 different things. And I, you know, believe that this is
 5 one of those places, where it gives me that opportunity.

6 Q Is there an -- a promotion by being reassigned
 7 to the real time crime unit?

8 A No, it's not a promotion. It's just a
 9 reassignment from one unit to another.

10 Q Okay. And is there -- was there any increase
 11 in pay?

12 A No increase in pay.

13 Q Was there an increase in pay when you got
 14 moved to the narcotics unit from patrol? Did that
 15 increase your pay at all?

16 A No. There's no increase in pay.

17 Q Okay. And it -- did it increase -- change
 18 your rank at all? You weren't like a detective? You're
 19 still patrol, just narcotics?

20 A You are assigned to the detective division as
 21 a patrol officer, which you go through a probationary
 22 period of, give or take, 18 months under -- you know,
 23 attached to the detective division. Once you pass your
 24 probationary period, you are -- you know, if you are --
 25 you know, if you're good at your job, you get designated

1 you? Twelve years?

2 A There's a break in between.

3 Q What's the break in between?

4 A January or February 2010.

5 Q What did you do? What was the break for?

6 A This was the -- this is at the time where I
 7 was placed on modified duty.

8 Q I'm sorry, I didn't hear that last part. What
 9 did you say, you're placed on what?

10 A Modified duty.

11 Q What's that?

12 A You are placed on modified duty, it -- it
 13 depends on the situation.

14 Q Why were you placed on modified duty in
 15 January 2010?

16 A Because I was under investigation for an
 17 incident.

18 Q How long were you placed on modified duty?

19 A I was on modified duty for two years.

20 Q Were you taken off the street and put on a
 21 desk job?

22 A Yes.

23 Q Okay. And so you had a desk job for two years
 24 for -- from approximately January 2010 to January 2012?

25 A January or February time frame, give or take.

Page 50

1 Q What were you being investigated for?
 2 A I -- the -- it was an incident that took place
 3 that was being investigated.
 4 Q What was the incident that took place that was
 5 being investigated?
 6 A Off duty incident. Altercation.
 7 Q Was the off-duty altercation being
 8 investigated?
 9 A It was an altercation with a -- with an
 10 acquaintance of mine -- close friends of mine.
 11 Q Okay. Did -- was it a -- you said a close
 12 friend. Was it a romantic relationship?
 13 A No.
 14 Q Okay. No.
 15 A No.
 16 Q Okay. It wasn't -- it was an altercation. Was
 17 there a fight with a friend?
 18 A Fight. Yes.
 19 Q A fist fight?
 20 A Yes.
 21 Q Did anybody get injured?
 22 A Yes.
 23 Q Did you or the other person -- was it you and
 24 just one other person or multiple people?
 25 A No, just me and another person.

Page 51

1 Q And did you get injured, or did the other
 2 person, or both of you?
 3 A The other person got injured.
 4 Q What injuries did the other person sustain?
 5 MR. BUSHNELL: Objection. Go ahead. You can
 6 answer.
 7 A Facial.
 8 Q Facial injuries?
 9 A Facial injuries.
 10 Q Any broken bones?
 11 MR. BUSHNELL: Objection. You can answer.
 12 A I can't recall whether it was broken bones.
 13 Q Did Mount Vernon Police respond to the scene
 14 or did this -- well, sorry. Did the incident occur in
 15 Mount Vernon?
 16 A No.
 17 Q Where did it occur?
 18 A Town of Greenburgh. Westchester County, New
 19 York.
 20 Q Did any law enforcement respond to the
 21 altercation?
 22 A No -- not to my knowledge, no.
 23 Q Did -- how did the -- how did it come to be
 24 known by Mount Vernon that you'd been involved in this
 25 altercation? Was there a complaint filed?

Page 52

1 A I -- to my know -- I'm not clear about how
 2 they came about to know -- or how, you know, somehow
 3 police got involved. I can't remember how that
 4 happened.
 5 Q Okay. Was there an internal investigation?
 6 A I believe it was, yes.
 7 Q Did you -- do you know the outcome of the
 8 internal investigation?
 9 A I do not recall the outcome of the
 10 investigation.
 11 Q Were you interviewed in person during the
 12 course of the internal investigation by internal
 13 affairs?
 14 A I don't remember being interviewed about it. I
 15 do not.
 16 Q Do you know why you were on modified duty for
 17 two years? Why it took two years for the investigation?
 18 A I always wonder the same question. But no, I
 19 don't remember why.
 20 Q Do you remember the outcome of the
 21 investigation?
 22 A There was no outcome.
 23 Q Well, did they just take you off modified duty
 24 and did they tell you any, you know -- I'm sorry, let me
 25 strike that. You don't remember -- you don't remember

Page 53

1 learning the outcome of the investigation?
 2 MR. BUSHNELL: Objection. Go ahead.
 3 A Correct.
 4 Q Were any criminal charges placed on you?
 5 A No.
 6 Q And you have no idea as you sit here today,
 7 how Mount Vernon came to know about the altercation with
 8 your acquaintance?
 9 A Correct.
 10 Q What was the individual's name who you had the
 11 altercation with?
 12 MR. BUSHNELL: Objection. Go ahead.
 13 A Miguel Sanchez.
 14 Q And do you remember what the subject -- or why
 15 you guys got into a fight?
 16 MR. BUSHNELL: Objection. You can answer.
 17 A I don't. Tell the truth, it was so long ago.
 18 Q Were there -- were -- had you or -- had you
 19 been drinking prior to the altercation?
 20 MR. BUSHNELL: Objection. You can answer.
 21 A I don't remember if we were drinking or not.
 22 Q Is Miguel Sanchez -- was he a friend of yours
 23 at that time?
 24 A Yes.
 25 Q Is he now?

Page 54

1 A We haven't spoken since the incident.
 2 Q And do you have knowledge of whether Mr.
 3 Sanchez reported this off-duty incident to Mount Vernon?
 4 A No.
 5 Q Okay. So other than that break for modified
 6 duty for approximately two years in the winter months of
 7 2010 to the winter months of 2012, you were assigned to
 8 the narcotics unit at the Mount Vernon Police Department
 9 from January, February 2009 to your transfer -- or your
 10 secondment over to the real time crime unit in 2021,
 11 correct?
 12 A Can you repeat the whole question again?
 13 Q Yeah. Sorry. That was a long one. So other
 14 than the time where you were placed on modified duty --
 15 A Yes.
 16 Q -- is it accurate to say that you were
 17 assigned to the narcotics unit of the Mount Vernon
 18 Police Department from January or February 2009 all the
 19 way until when you've just recently been seconded to the
 20 real time crime unit of Westchester County?
 21 A Yes.
 22 Q And so other than the time of modified duty,
 23 you -- did you have any other assignments other than the
 24 narcotics unit?
 25 A Narcotics unit.

Page 55

1 Q Okay. Okay. When you first came to the
 2 narcotics unit in 2009, how many officers were assigned
 3 to the narcotics unit?
 4 A I can't give a specific number.
 5 Q How about approximately?
 6 A Between six, eight.
 7 Q Did the narcotics unit operate on more than
 8 one shift?
 9 A No. Just one shift.
 10 Q What shift?
 11 A It varied. It all depend. So we either came
 12 in -- we usually used to come in between 10:00 and 6:00
 13 or 1:00 to 9:00, depending on the needs of the --
 14 whatever investigation was, you know, being conducted at
 15 the time.
 16 Q Okay. So -- and is that true the entire time
 17 you were assigned to the narcotics unit, that it just
 18 operated one shift?
 19 A One shift.
 20 Q But I mean, I'm saying that's the entire
 21 duration of your assignment, it was always just one
 22 shift?
 23 A One shift.
 24 Q Okay. Okay. And there were, you think,
 25 somewhere between six to eight narcotics officers when

Page 56

1 you first were assigned in 2009, correct?
 2 A Correct.
 3 Q How about when you had your secondment to
 4 Westchester County in 2021, how many narcotics unit
 5 officers were assigned?
 6 A I -- about the same.
 7 Q And was there always a lieutenant on duty with
 8 the narcotics unit?
 9 A A what?
 10 Q A lieutenant or a sergeant. Did you have,
 11 like, a supervising officer with --
 12 A Yes.
 13 Q Okay. Who was the supervising officer when
 14 you got to the narcotics unit in 2009?
 15 A At the time, Sergeant Daniel Fischer.
 16 Q Can you repeat the name for me?
 17 A Daniel Fischer.
 18 Q Daniel Fischer. Okay. How long did you work
 19 with Daniel Fischer?
 20 A All the way up to 2009.
 21 Q Well, you started there -- oh, the whole year
 22 of 2009?
 23 A Correct.
 24 Q And then who became the next supervising
 25 officer of the narcotics unit?

Page 57

1 A No. When I was placed on modified duty, the
 2 next supervisor after that was Vinny -- Vincent Stufano.
 3 Q Okay. Did you ever work under Vincent
 4 Stufano?
 5 A No.
 6 Q Okay. That was during your modified duty?
 7 Okay.
 8 A Correct.
 9 Q How about -- who was the next supervising
 10 officer for the narcotics unit?
 11 A The second time that I came up?
 12 Q Yep.
 13 A Anthony Mitchell -- Sergeant Anthony Mitchell.
 14 Q Okay. And so you worked under Sergeant
 15 Anthony Mitchell in -- when you came back in 2012?
 16 A Yes.
 17 Q How long did you work under Sergeant Anthony
 18 Mitchell as a narcotics officer?
 19 A Briefly. Possibly, a couple of months.
 20 Q Okay. Who was next?
 21 A At the time, Sergeant Anthony McEachin.
 22 Q McKitchy?
 23 A McEachin.
 24 Q McEachin.
 25 A M-E-C-Q --

<p style="text-align: right;">Page 58</p> <p>1 MR. BUSHNELL: M-C-E-A-C-H-I-N, I believe. Or 2 McEachin. 3 A Give or take. 4 Q All right. Who was the next supervising -- 5 how long did you work under Sergeant Anthony McEachin? 6 A Maybe a year and a half -- a year, give or 7 take. 8 Q Who is next? 9 A Sean Fegan. Sergeant Sean Fagan. Yeah. 10 Q How long did -- was Sergeant Sean -- Sergeant 11 Sean Fegan the supervising officer of the narcotics 12 unit? 13 A Until two years ago, 2019 -- December 2019. 14 Q Well did Sergeant -- what happened to Sergeant 15 Fegan then? Did he leave the narcotics unit? 16 A Yes. He got a -- he's assigned to the general 17 investigations unit. 18 Q Do you know why he was reassigned from 19 narcotics to general investigations? 20 MR. BUSHNELL: Objection. You can answer. 21 A Needs of the department 22 Q And who replaced Sergeant Fegan? 23 A Two sergeants came in right after Sergeant 24 Fegan. 25 Q Who were they?</p>	<p style="text-align: right;">Page 60</p> <p>1 Q Did you go with Shawn Fegan together? 2 A No, he's still the supervisor in the general 3 investigation too. 4 Q I'm sorry. Did you and Sean Fegan move from 5 narcotics over to general investigations together? 6 A He was there first. 7 Q And then you went and joined him? 8 A Correct. 9 Q And then you were in general investigations 10 for about a year, before you went to Westchester? 11 A Give or take, yes. 12 Q Okay. So when did you leave narcotics for 13 general investigations? 14 A The beginning of 2020. 15 Q Okay. Okay. Okay. How long do you plan to 16 be with the real time crime unit? 17 MR. BUSHNELL: Objection. You can answer. 18 A How long do I plan to be there? 19 Q Yeah. How long do you plan to stay -- do you 20 have plans to stay there for a certain length of time? 21 A It is on the needs of the department. So if 22 they want to keep me there for the duration, I'll be 23 there for the duration. If they need me back in their 24 department, back at -- you know, working in Mount 25 Vernon, they'll request me back in Mount Vernon.</p>
<p style="text-align: right;">Page 59</p> <p>1 A That's going -- there were -- they are 2 currently Pedro Abreu and Wendell Griffith. 3 Q Pedro Abreu? 4 A Pedro Abreu. 5 Q Abreu. Okay. How do you spell Abreu; if you 6 know? 7 A A-B-R-E-U. 8 Q Okay. Okay. And I'm sorry, the second one, 9 Griffin? 10 A Wendell Griffin. 11 Q Wendell Griffin. Okay. And did you work 12 under both Sergeant Pedro Abreu and Sergeant Wendell 13 Griffin prior to your secondment to Westchester County? 14 A No. We were -- they -- both, Pedro Abreu and 15 Wendell Griffin were in the narcotics unit prior to them 16 being promoted to sergeant. So we used to work 17 together, too. So -- but by the time they took over the 18 unit, I was reassigned to the general investigations 19 unit. So this was -- 20 Q So I maybe missed this. Did you go to general 21 investigations before you went to Westchester County? 22 A Yes. I was -- I went to Westchester County 23 from the general investigation unit. 24 Q How long were you in general investigations? 25 A Maybe a year.</p>	<p style="text-align: right;">Page 61</p> <p>1 Q When is your -- when is your -- how long do 2 you plan to work as a police officer with Mount Vernon? 3 MR. BUSHNELL: Objection. You can answer. 4 A Until I'm ready to retire. 5 Q Is there -- do they count -- does Mount Vernon 6 count the years you served with NYPD towards your 7 service with them for -- towards a pension? 8 A I believe they do. That's not -- Mount Vernon 9 doesn't count it, it's the state. 10 Q Oh, the state. I'm sorry. Thank you for 11 clarifying. Okay. So you -- officers in New York get 12 their pensions through the state, not through the 13 municipality? 14 A Correct. 15 Q I see. Okay. Little different here in 16 Chicago. Okay. Okay. Let's talk about Sean Fegan. Did 17 you know Sean Fegan before you got to the narcotics 18 unit? 19 A When? 20 Q Like when you were working patrol, did you -- 21 was he on patrol with you? 22 A No. 23 Q Okay. Did you -- and so the first time you 24 really worked with him was when you were assigned to 25 narcotics?</p>

	Page 62
<p>1 A Yes.</p> <p>2 Q And was he already a narcotics officer before</p> <p>3 he became the sergeant of the unit?</p> <p>4 A Yes.</p> <p>5 Q Okay. So did you guys work together as</p> <p>6 narcotics officers before his promotion to sergeant?</p> <p>7 A Yes.</p> <p>8 Q So you were -- is it fair to say you worked</p> <p>9 with Sergeant Fegan for a good portion of your career?</p> <p>10 A When we first were in the same unit together,</p> <p>11 me as a police officer and him as a detective, maybe</p> <p>12 eight months before he was, you know, reassigned to the</p> <p>13 detective -- to the general investigations unit or the</p> <p>14 major case unit, which -- one of those two at the time.</p> <p>15 So we probably worked together for maybe six to eight</p> <p>16 months. And then the next time we worked together was</p> <p>17 when he be -- he was assigned the narcotics unit</p> <p>18 supervisor sometime in 2013.</p> <p>19 Q Okay. Do you consider -- you know, apart from</p> <p>20 being a work colleague, are you social friends with Sean</p> <p>21 Fegan?</p> <p>22 A No. We'll socially say, hi, how you doing?.</p> <p>23 Stuff like -- hanging out after work?</p> <p>24 Q Yes.</p> <p>25 A Outside of work? No.</p>	Page 64
	<p>1 VIDEOPHOTOGRAPHER: Okay. We -- oh, pardon. Go</p> <p>2 right ahead.</p> <p>3 MR. BUSHNELL: Heather, when do you want to</p> <p>4 come back? Do you want to give a specific time?</p> <p>5 MS. DONNELL: I just need five minutes. So I</p> <p>6 just need a quick bathroom break. So let's go off</p> <p>7 the record, though.</p> <p>8 VIDEOPHOTOGRAPHER: Okay. Off record at 11:12.</p> <p>9 (OFF THE RECORD)</p> <p>10 VIDEOPHOTOGRAPHER: All right, we are now back on</p> <p>11 the record at 11:21 a.m.</p> <p>12 BY MS. DONNELL:</p> <p>13 Q Okay. Okay. Detective Antonini, can you</p> <p>14 define for me a pat-down search.</p> <p>15 A A pat down?</p> <p>16 Q Yes, please.</p> <p>17 A That is a pat down of the outer most garment,</p> <p>18 where you pat down the outer most garment of pockets --</p> <p>19 everywhere that -- you know, with your hands.</p> <p>20 Q And what's the -- your understanding of the</p> <p>21 purpose of a pat-down search?</p> <p>22 A In order to feel what -- any -- you know,</p> <p>23 whoever it is you're patting down, may or may not have</p> <p>24 in his pockets or outer most garment.</p> <p>25 Q When do you conduct pat-down searches?</p>
	Page 63
<p>1 Q Yes.</p> <p>2 A We don't do that.</p> <p>3 Q How about the other defendants, like Robert</p> <p>4 Puff, are you social friends with Officer Puff?</p> <p>5 A No. We don't -- we don't associate outside of</p> <p>6 work.</p> <p>7 Q How about Patrick King?</p> <p>8 A No.</p> <p>9 Q Sergeant Jose Quinoy?</p> <p>10 A No.</p> <p>11 Q Sebastian Salazar?</p> <p>12 A Who?</p> <p>13 Q Is it Sebastian Salazar?</p> <p>14 A I don't even know who that is, but no.</p> <p>15 Q Okay. Are you -- how about Jose Valente?</p> <p>16 A Who?</p> <p>17 Q Jose Valente?</p> <p>18 A Joseph Valente?</p> <p>19 Q Joseph Valente, sorry.</p> <p>20 A No.</p> <p>21 MS. DONNELL: Okay. I'm going to switch gears,</p> <p>22 but I want to just take a short, five minute break.</p> <p>23 So let's go off the record.</p> <p>24 THE WITNESS: Okay.</p> <p>25 MR. BUSHNELL: So --</p>	Page 65

Page 66

1 A The definition of a strip search. I mean, a
 2 strip -- stripping down the individual's clothing.
 3 Q Okay. Anything else, in terms of your
 4 understanding of a strip search?

5 A Stripping down the individual's clothing.
 6 Q Is that it?

7 A Yes.

8 Q And what is your understanding of when -- of
 9 what is necessary, in order to conduct a strip search?

10 MR. BUSHNELL: Objection. You can answer.
 11 A There might be a -- circumstances where it
 12 might be known that the individual in question may or
 13 may not have any weapons or contraband. That might, you
 14 know, request a more thorough strip search. So in other
 15 words, rather than just going through the pat-down
 16 routine, you want to go more in-depth into the seams of
 17 the -- let's say -- give an example, seams of the
 18 clothing, you know, hidden pockets, or stuff like that.

19 Q And is there any approval necessary to conduct
 20 a strip search prior to doing it?

21 A A supervisor is always present during any
 22 search.

23 Q During any strip search?

24 A Correct.

25 Q So you have to have a supervisor physically

Page 68

1 justify a strip search? Does there have to be something
 2 more? Or is probable cause that a crime was committed -
 3 - any crime committed, sufficient to justify a strip
 4 search?

5 MR. BUSHNELL: Objection. You can answer.

6 A Do you mind repeating that again?

7 Q Oh yeah, no problem. I - sometimes I speak a
 8 little quickly too. So you said that you have to have
 9 probable cause before you can conduct a strip search.
 10 And you also said that there needs to be a supervisor
 11 physically present, in order to conduct a strip search.
 12 My question to you was, is probable cause that an
 13 individual committed a criminal offense sufficient to
 14 justify a strip search? Or do you need something more?

15 A Prior knowledge that the individual may be --
 16 may have a history of concealing either weapons or
 17 contraband. You know, for the safety of the officers
 18 involved in the strip search or the - or the safety of
 19 the individual being strip-searched, as it is.

20 Q Anything else that you can think of other than
 21 what you've testified to?

22 A No.

23 Q What is your - so just to repeat, your
 24 understanding of a strip search is that it can only be
 25 conducted of somebody's been arrested or there's

Page 67

1 present?

2 A Correct.

3 Q Any other requirements?

4 A As far as?

5 Q Do you have to have any -- what justification
 6 do you have to have to seek -- conduct a strip search of
 7 an individual?

8 MR. BUSHNELL: Objection. Asked and answered.

9 You can answer it.

10 A Probable cause.

11 Q Probable cause for what?

12 A To conduct a strip search.

13 Q Well, what does that mean? Explain.

14 A You know, you cannot just detain an individual
 15 and search him for the sake of searching. You need to
 16 have probable cause in order to conduct -- you could
 17 conduct a pat down of the outer most -- outer most
 18 garment. But in order to conduct a strip search, the
 19 individual either, A, might be in custody -- police
 20 custody for whatever reason.

21 Q So it has to be pursuant to already having a -
 22 - had probable cause to arrest an individual?

23 A Correct.

24 Q Do you have to have something more than just
 25 probable cause to arrest someone for a crime, in order

Page 69

1 probable cause for an arrest; is that correct?

2 MR. BUSHNELL: Objection. You can answer.

3 A Under police custody, yes.

4 Q So the individual has to be in police custody.
 5 And then the second thing you said is the supervisor has
 6 to be physically present for the strip search; is that
 7 right?

8 A Correct.

9 Q And when I asked - inquired about the
 10 justification, you said it had to do with individual
 11 safety or office safety, for concealing a weapon or
 12 contraband, correct?

13 A Correct.

14 Q Okay. Is there any other - what - is there
 15 anything else - other than what you've testified,
 16 anything else in order to conduct a strip search?

17 A No.

18 Q Okay. What is your understanding of a body
 19 cavity search?

20 A We don't do body cavity searches.

21 Q That's fine. But what is your understanding
 22 of what constitutes a body cavity search?

23 A What is my understanding of a body cavity
 24 search?

25 Q Yes.

<p>1 A We don't conduct them.</p> <p>2 MR. BUSHNELL: Objection. You can -</p> <p>3 Q I understand you don't conduct it, but what's</p> <p>4 your understanding of what constitutes - what is the</p> <p>5 definition of a body cavity search in your</p> <p>6 understanding?</p> <p>7 MR. BUSHNELL: Objection. You can answer, if</p> <p>8 you can.</p> <p>9 A The searching of a body cavity. You - would</p> <p>10 you like me to describe what a body cavity is?</p> <p>11 Q Yeah. What is your understanding of what</p> <p>12 constitutes a body cavity search?</p> <p>13 A All right. It could be your mouth. It could</p> <p>14 be, you know, your ears, your nostrils. It could be</p> <p>15 your anus. You know, it can also be - we're speaking on</p> <p>16 gender-wise, female-wise, obviously there's two sides to</p> <p>17 that. But same thing, facial, anywhere there's, you</p> <p>18 know, a cavity.</p> <p>19 Q So your understanding of a body cavity search</p> <p>20 is any sort of body cavity, be it mouth, ear, nostrils,</p> <p>21 anus, vagina. That's a body cavity search?</p> <p>22 A Correct.</p> <p>23 Q Okay. And you earlier testified that we don't</p> <p>24 conduct those, meaning you as a police officer are not</p> <p>25 authorized to conduct a body cavity search, is that your</p>	<p>Page 70</p> <p>1 A Strip search would be, we'd remove the</p> <p>2 clothing so we could search all their cavities in --</p> <p>3 within the clothing.</p> <p>4 Q Okay. How about asking individual to spread</p> <p>5 their buttocks for a visual inspection of their anus, to</p> <p>6 see if there's any contraband or weapon secreted in</p> <p>7 their buttocks? Is that a strip search?</p> <p>8 A No.</p> <p>9 Q Is that - why not?</p> <p>10 A A strip - like I said, a strip search would</p> <p>11 constitute of the removing of the clothing.</p> <p>12 Q And not searching anybody's body?</p> <p>13 A No.</p> <p>14 Q Have you - and what about asking someone to</p> <p>15 bend down and cough?</p> <p>16 A No, we'll -</p> <p>17 Q While their - while their clothing's removed?</p> <p>18 A Correct.</p> <p>19 Q What is that?</p> <p>20 A We'll ask an individual to, you know, bend</p> <p>21 down on your knees, cough. Other than that, we don't</p> <p>22 physically search any cavities in -</p> <p>23 Q But do you ask individuals when - when you're</p> <p>24 - when somebody's being strip-searched, do you ask</p> <p>25 individuals to kneel, or squat, or cough while their</p>
<p>1 understanding?</p> <p>2 MR. BUSHNELL: Objection. You can answer.</p> <p>3 A Correct.</p> <p>4 Q Okay. So if you thought an individual was</p> <p>5 secreting some drugs in their mouth cavity, you wouldn't</p> <p>6 search an individual's mouth?</p> <p>7 MR. BUSHNELL: Objection. You can answer.</p> <p>8 A Mouth?</p> <p>9 Q Yes.</p> <p>10 A We could ask the individual to open his mouth.</p> <p>11 Q Okay. So you - that is something you're</p> <p>12 permitted to do, correct?</p> <p>13 A Obviously, yes. You know, I could ask you,</p> <p>14 can you open your mouth for me? If you choose to, yes,</p> <p>15 of course.</p> <p>16 Q Okay. How about -- so when I'm -- I'm going</p> <p>17 to ask you some scenarios and I want you to tell me what</p> <p>18 -- whether -- what is -- if it's a strip search or not.</p> <p>19 If you ask an individual -- or, if an individual is --</p> <p>20 clothing is removed, their pants and underwear, and</p> <p>21 they're asked to bend over and spread their buttocks</p> <p>22 cheeks for a visual inspection of their anus. Is that a</p> <p>23 strip search or not?</p> <p>24 A A strip search?</p> <p>25 Q Is that a strip search?</p>	<p>Page 71</p> <p>1 clothing is removed -</p> <p>2 A Correct.</p> <p>3 Q -- during a strip search?</p> <p>4 A Correct.</p> <p>5 Q You're saying, correct?</p> <p>6 A Correct, yeah.</p> <p>7 Q Yes, that is something you do?</p> <p>8 A Yes. Yes.</p> <p>9 Q Okay. Do you ever ask individuals in the</p> <p>10 course of a strip search, to themselves spread their</p> <p>11 buttock cheeks?</p> <p>12 A No.</p> <p>13 MR. BUSHNELL: Objection. Just for</p> <p>14 clarification, you're talking about every time</p> <p>15 there's a strip search?</p> <p>16 MS. DONNELL: No. I'm just saying in general.</p> <p>17 If it's a - if that conduct constitutes a strip</p> <p>18 search or it can be done as part of a strip search.</p> <p>19 I can make my question clearer.</p> <p>20 BY MS. DONNELL:</p> <p>21 Q Okay. Detective Antonini, is it in your view,</p> <p>22 permissible as part of a strip search to ask the</p> <p>23 individual who's been unclothed - their clothing taken</p> <p>24 off, to bend down, or squat, or kneel?</p> <p>25 A While still secure in handcuffs. Yes.</p>

Page 74

1 Q Okay. And is that something you have asked
 2 individuals to do when you've conducted strip search as
 3 a Mount Vernon police officer?

4 MR. BUSHNELL: Objection. You can answer.

5 A Yes.

6 Q Okay. How about asking an individual to bend
 7 over from the waist, so that their buttocks is more
 8 exposed for a visual inspection? Have you ever asked an
 9 individual to do that during the course of a strip
 10 search?

11 A It - depending on a circumstances, but yes.

12 Q Okay. So the answer is yes, you have done
 13 that before, depending on the circumstances, correct?

14 A Depending on - it - what I mean by that is,
 15 some individuals may have leg injuries where they cannot
 16 bend down. They cannot squat down due to some - you
 17 know, some physical - you know.

18 Q So you're saying if somebody was not
 19 physically able to kneel or squat -

20 A Correct.

21 Q -- you may request for them to bend over --

22 A That's a yes.

23 Q -- at the waist? Okay. So - so far during
 24 the course of a strip search, when somebody's unclothed
 25 in your view, it's permissible to ask them to kneel

Page 75

1 down, squat, or bend over at the waist to expose their
 2 buttocks for visual inspection, correct?

3 A Well -

4 MR. BUSHNELL: Well, objection - objection. In
 5 what circumstance? I mean, we're talking about --

6 MS. DONNELL: Well no, what I'm saying is --
 7 I'm sorry, go ahead, Steven. I didn't mean to
 8 interrupt you.

9 MR. BUSHNELL: Yeah. I mean, we're talking
 10 about the scenario devoid of any, you know, prior
 11 knowledge of the officer, et cetera, important
 12 circumstances of an arrest. This is very general
 13 and I don't think that it's specific enough.

14 MS. DONNELL: Okay, I hear your objection. I
 15 am asking - I am asking these questions, I think
 16 they're general questions, but I want to know what
 17 constitutes, in the witness' mind, conduct that is
 18 part of a strip search. So I'm going to keep
 19 asking.

20 BY MS. DONNELL:

21 Q But I'll try and make my questions more clear,
 22 Detective Antonini. And if you don't understand them,
 23 or if they not clear, let me know. Okay. So in the
 24 course of a strip search - well, why don't we do it this
 25 way. Why don't you describe for me what is the

Page 76

1 permissible actions that you as an officer are permitted
 2 to do in the course of a strip search, to inspect for
 3 contraband or weapons that might be secreted on the
 4 person?

5 A Prior knowledge, criminal history, severity of
 6 the crime committed.

7 Q I apologize. I think you might not have
 8 understood my question. It sounds like you're providing
 9 to me the factors that go into determining whether to
 10 conduct a strip search, right?

11 A Correct.

12 Q Okay. I appreciate that. I do want to know
 13 that. But what I asked was, can you describe for me the
 14 actions that you, the police officer, are permitted to
 15 request the individual being strip-searched to do, in
 16 the course of your strip search?

17 A The actions -

18 Q Assume for me that you've already requested a
 19 strip search, and you're in the process of conducting a
 20 strip search. Describe for me how you can conduct a
 21 strip search?

22 A How I can conduct it?

23 Q Yes.

24 A Meaning how I go about conducting it?

25 Q Yes, please.

Page 77

1 A Well, first you start with the pat down of the
 2 outer most garment, the individual still being secure in
 3 handcuffs, obviously. If the individual is already in
 4 police custody, he's going to be placed - he's already
 5 under arrest with charges pending, then the search is
 6 more of a - you know, goes into more depth in other
 7 words. So you conduct a more thorough search of the
 8 outer garment, top of the body, mouth, ears, what -
 9 wherever you can think that the individual may or may
 10 not be hiding something. And again, this is all based
 11 on prior knowledge and experience, where an individual
 12 might be able to hide either contraband or weapons.

13 Okay? So once you start with the top, then you begin to
 14 the bottom, you remove all belts, jewelry, any metal
 15 objects from all pockets, and whatnot. And you become -
 16 you conduct a strip search, you remove all the
 17 clothing items from the individual, socks, shoes,
 18 shoelaces. They're permitted to keep one item of
 19 clothing, which obviously in this case will be a pair of
 20 socks, pair of underwears, one top, i.e., either a
 21 sweater or T-shirt. No belts. That's one of the other
 22 reasons why we have to remove all the clothing items.
 23 Once that's done, we have removed everything, we ask the
 24 individual, do me a favor, can you squat down, cough?
 25 Once they squat and cough, they come back up and we

Page 78

1 begin the process of just getting them -- getting the
 2 individual, you know, redressed, or put the clothes back
 3 on, whatever clothes are permitted to be kept at the
 4 time. So shoes without shoelaces or sneakers without
 5 shoe laces, pair of socks, underwear, pants, shirt, or
 6 whatever they wearing on top, and -- pretty much
 7 constitute a strip search.

8 Q Okay. Are you as an officer permitted to
 9 physically touch the individual, in the course of the
 10 strip search?

11 A Yes. I have to hold onto his arm. Make sure
 12 he doesn't fall down.

13 Q So you're holding onto the arm, while the
 14 person is either squatting and coughing?

15 A Yes. We wouldn't want the individual to fall
 16 down, get injured, or anything like that.

17 Q Are you -- and I think I asked this, but I'm
 18 just going to be clear. Are you permitted to ask an
 19 individual to spread their buttock cheeks and to
 20 visually inspect the individual anus, or in between
 21 their --

22 A No. We don't allow -- no. We hold on to
 23 their arms as they're squatting down -- squat down.

24 Q Have you ever asked anybody to bend over to
 25 expose their buttock cheeks to you, and to spread their

Page 80

1 said sometimes, if someone's not able for medical
 2 reasons or physical reasons to squat and cough, you've
 3 asked them to bend over from the waist, correct?

4 A Correct.

5 Q Okay. So you have done it. And then during
 6 it, you just asked them to bend over from the waist and
 7 then you just visually inspect?

8 A Bend over from the waist, cough, visually
 9 inspect.

10 Q And you -- okay. Have you conducted strip
 11 searches like you've described -- or the way in which
 12 you described, out in the field?

13 MR. BUSHNELL: Objection. You can answer.

14 A Depending on the circumstance, search
 15 warrants.

16 Q So is the answer, yes, you have conducted
 17 strip searches out in the field?

18 A Yes.

19 Q Okay. Have you conducted strip searches at
 20 the Mount Vernon Police Department?

21 A Yes.

22 Q Okay. Let's talk about strip search in the
 23 field. How many strip searches have you conducted --
 24 been part of conducting in the field?

25 MR. BUSHNELL: Objection. You can answer.

Page 79

1 buttock cheeks and expose their anus? Have you ever
 2 done that?

3 A Squat and cough.

4 Q I know. Have you ever asked anyone to bend
 5 over to ex -- to spread their butt cheeks, so you could
 6 visually inspect their anus? Have you ever done that?

7 A No.

8 Q Okay. Have you ever touched an individual who
 9 you're conducting a strip search and spread their
 10 buttocks to inspect their anus? Have you ever done
 11 that?

12 A Have I ever spread their cheeks?

13 Q Yes.

14 A No. No.

15 Q Have you ever run your hand, whether gloved or
 16 not, between an individual's buttocks cheeks to inspect
 17 for weapons or contraband?

18 A No.

19 Q Okay. So the only way that you have ever
 20 conducted a strip search, it's your testimony today, is
 21 by asking the individual, after they're undressed to
 22 squat and cough? That's the only way you have ever done
 23 a strip search?

24 A Correct.

25 Q But then you said sometimes -- earlier, you

Page 81

1 A That would be like asking me how many arrests
 2 have I had.

3 Q Is it --

4 A So you can't put a number to that, obviously.
 5 This -- in the field?

6 Q Yes.

7 A I mean -- I mean, there's been a few,
 8 obviously. Think about it, the number of search
 9 warrants that I've been involved in throughout my career
 10 has been a lot, so...

11 Q Do you conduct a strip search every time you
 12 have a search warrant?

13 A Not every time, no.

14 Q Okay. So are you able, as you sit here today,
 15 to estimate the number of strip searches you've
 16 conducted in the field as a Mount Vernon police officer?

17 A No.

18 MR. BUSHNELL: Objection. You can answer.

19 Q Okay.

20 MR. BUSHNELL: Sorry. Just noting my
 21 objection.

22 Q Are you able to put a -- are you able to say
 23 if it's more or less than a hundred?

24 MR. BUSHNELL: Objection. You can answer.

25 A No.

<p style="text-align: right;">Page 82</p> <p>1 Q You're not able to -- one way or the other, 2 you can't say?</p> <p>3 A No.</p> <p>4 Q Is that true, you can't say one way or the 5 other?</p> <p>6 A Yes.</p> <p>7 Q Okay. So it could be more than a hundred out 8 in the field?</p> <p>9 MR. BUSHNELL: Objection. You can answer.</p> <p>10 A No.</p> <p>11 Q It's less than a hundred?</p> <p>12 A Possibly, less than a hundred. Yes.</p> <p>13 Q But you don't know one way or the other?</p> <p>14 A One way or the other? No.</p> <p>15 Q How about -- how about strip searches you've 16 been present for, but not yourself conducted out in the 17 field, like one of your other fellow narcotics officers 18 did. Do -- can you say how many you've been present 19 for, for those?</p> <p>20 MR. BUSHNELL: Objection. You can answer.</p> <p>21 A No.</p> <p>22 Q Right. Is it too many to count?</p> <p>23 MR. BUSHNELL: Objection. You can answer.</p> <p>24 A What I'd say -- can't say.</p> <p>25 Q You can't say. How about -- you said you'd</p>	<p style="text-align: right;">Page 84</p> <p>1 right now?</p> <p>2 MR. BUSHNELL: I mean, how long do you 3 anticipate the line of questioning going?</p> <p>4 MS. DONNELL: Well, I mean, for a while. But I 5 would like to follow up on this, at least this one 6 aspect about reporting or documenting strip 7 searches. Could I ask a few more questions on that 8 subject?</p> <p>9 MR. BUSHNELL: Yeah, that's fine. Yeah, of 10 course.</p> <p>11 BY MS. DONNELL:</p> <p>12 Q Okay. So Detective Antonini, tell me how you 13 were trained with the Mount Vernon Police Department to 14 document when you conduct a strip search.</p> <p>15 A How we were trained to document?</p> <p>16 Q Yes.</p> <p>17 A The report will usually state something in 18 regards to, the strips search was conducted in the 19 presence of Sergeant Sean Fegan. The search was either 20 recorded, the individual was found to be, or not found 21 to be, in possession of any contraband or weapons. 22 Something to that -- to those lines.</p> <p>23 Q Okay. And you were trained to put that in a 24 incident report or a special report for the search? Or 25 just the incident report?</p>
<p style="text-align: right;">Page 83</p> <p>1 been part of conducting strip searches. You yourself 2 have conducted strip searches at the Mount Vernon Police 3 Department, right?</p> <p>4 A Yes.</p> <p>5 Q And are you -- can you estimate how many strip 6 searches you've conducted at the Mount Vernon Police 7 Department?</p> <p>8 A No. I can't estimate that.</p> <p>9 Q Why not?</p> <p>10 MR. BUSHNELL: Objection. You can answer.</p> <p>11 A It's not something that we keep count on.</p> <p>12 Q Okay. When you conduct a strip search, 13 whether in the field or in the Mount Vernon Police 14 Department, do you document it in any kind of official 15 police report?</p> <p>16 A Yes.</p> <p>17 Q Where do you document it?</p> <p>18 A Police report.</p> <p>19 MR. BUSHNELL: Can we -- can we take a quick 20 two-minute break please?</p> <p>21 VIDEOGRAPHER: We --</p> <p>22 MS. DONNELL: Um --</p> <p>23 COURT REPORTER: Oh?</p> <p>24 MS. DONNELL: Well, can I finish this line of 25 questioning, or do you need to talk to the witness</p>	<p style="text-align: right;">Page 85</p> <p>1 A Into the case report.</p> <p>2 Q Case report. Okay. You mentioned that you 3 would document whether the search was recorded or not, 4 right?</p> <p>5 A That is correct.</p> <p>6 Q And did you -- were strip searches required to 7 be recorded?</p> <p>8 A Part of the search is recorded.</p> <p>9 Q What part is recorded?</p> <p>10 A Well, we don't record the individual being 11 strip-searched. We record the audio of the individual 12 being strip-searched. Or prior to, we'll record the 13 individuals, and so then they say, we're going to do a 14 strip search. Is there anything you have on your 15 possession that you want to tell us now? And if the 16 individual says, no, I have something. Or, yes, I have 17 something. We'll turn the camera away. The camera's 18 still rolling. We going to have it just for the audio 19 part of it, so that way you know there's nothing crazy 20 here going on, other than the strip search itself. The 21 search continues after that and after the search is 22 concluded, the camera turns over back to the individual. 23 Then says, all right, we found X, Y, and Z. Or, we did 24 not find anything. Do you have any complaints? No. 25 Okay. The search is concluded. And then that video</p>

<p>1 gets put into evidence.</p> <p>2 Q Is it a requirement that any time a strip</p> <p>3 search is going to be conducted, whether in the field or</p> <p>4 at the station, that there -- be recorded in the way</p> <p>5 you've just described?</p> <p>6 A If there is a search that is conducted, then</p> <p>7 it is recorded. But if there is not, there is no</p> <p>8 search, there is no video, no search was conducted.</p> <p>9 Q So I take your testimony to be, anytime</p> <p>10 there's a search conducted, it is mandatory to video</p> <p>11 record the search in the way you've described; is that</p> <p>12 true?</p> <p>13 A We do our -- we do our best to have visual --</p> <p>14 a video evidence of that search.</p> <p>15 Q Okay. And if there is video evidence of the</p> <p>16 search, it is put into evidence with the case?</p> <p>17 A That is correct.</p> <p>18 Q Okay. And then it sounds like you're saying,</p> <p>19 sometimes you've conducted strip search where it hasn't</p> <p>20 been possible to video record for some reason or the</p> <p>21 other, right?</p> <p>22 A No. I'm -- bearing some, you know, video</p> <p>23 malfunction, but no, there's always been a recording of</p> <p>24 the strip search.</p> <p>25 Q Does the narcotics unit -- when you were</p>	<p>Page 86</p> <p>1 evidence?</p> <p>2 A Either a disk drive or thumb drive.</p> <p>3 MS. DONNELL: Okay. Thanks. Steve, I can give</p> <p>4 you a break now, if you want to go off the record.</p> <p>5 MR. BUSHNELL: Yeah, just a couple minutes.</p> <p>6 Thanks.</p> <p>7 MS. DONNELL: Sure. Let's go off the record.</p> <p>8 VIDEOGRAPHER: Okay. We are now off the record</p> <p>9 at 11:49.</p> <p>10 (OFF THE RECORD)</p> <p>11 VIDEOGRAPHER: We are back on the record at</p> <p>12 11:56 a.m.</p> <p>13 BY MS. DONNELL:</p> <p>14 Q Okay. Now, Detective Antonini, did you just</p> <p>15 consult with your attorney regarding your testimony?</p> <p>16 A Yes.</p> <p>17 Q Okay. What did you discuss with him regarding</p> <p>18 your testimony?</p> <p>19 MR. BUSHNELL: No. Objection. He can't -- I</p> <p>20 mean, I asked if you wanted him to clarify -- you</p> <p>21 can't talk about his communications with his</p> <p>22 attorney. There was no question pending.</p> <p>23 MS. DONNELL: Well, and, you know, this might</p> <p>24 be unique to your juris -- and maybe you can help</p> <p>25 me, but in our jurisdiction, usually we conduct</p>
<p>Page 87</p> <p>1 assigned the narcotics unit, always carry with it a</p> <p>2 portable video recorder?</p> <p>3 A Yes.</p> <p>4 Q How about if you're at the station, is there a</p> <p>5 recording device at the station?</p> <p>6 A Yes.</p> <p>7 Q The same one or a different one? The same</p> <p>8 video recorder that the narcotics unit has or a</p> <p>9 different type of video recording?</p> <p>10 A I believe it's a different one. They have</p> <p>11 their own different -- patrol -- patrol -- the cell</p> <p>12 block and the patrol unit -- the patrol division has its</p> <p>13 own recording mechanism.</p> <p>14 Q When you have conducted strip searches at the</p> <p>15 department, where have you conducted them physically</p> <p>16 within the department? In the narcotics unit office or</p> <p>17 some other --</p> <p>18 A Usually in our narcotics room, yes. We have</p> <p>19 our own holding cell.</p> <p>20 Q Is there a recording device in the holding</p> <p>21 cell within the narcotics unit?</p> <p>22 A No. Just the recording device that we have.</p> <p>23 Q And the recording device the narcotics unit</p> <p>24 has, what does it -- how do you transfer the data? Does</p> <p>25 it -- on a jump drive or how do you get it into</p>	<p>Page 89</p> <p>1 depositions as if they're trial testimony. So once</p> <p>2 the witness is under oath, the testimony or the</p> <p>3 substance of the testimony isn't really discussed.</p> <p>4 Perhaps it's different in the southern district, but</p> <p>5 here in the Seventh Circuit, we usually conduct</p> <p>6 depositions in that manner. So once the witness is</p> <p>7 under oath, then it's as if it's a -- you know,</p> <p>8 testimony.</p> <p>9 MR. BUSHNELL: That's not what my understanding</p> <p>10 --</p> <p>11 MS. DONNELL: At trial. Okay.</p> <p>12 MR. BUSHNELL: That's not my understanding. We</p> <p>13 were off the record. He was having a conversation</p> <p>14 with his attorney. It's privileged.</p> <p>15 MS. DONNELL: Okay. So just for purposes here,</p> <p>16 you're going to assert a privilege over any of your</p> <p>17 communications you just had in this break at the</p> <p>18 deposition with your -- with Mr. -- Detective</p> <p>19 Antonini; is that correct?</p> <p>20 MR. BUSHNELL: That's correct.</p> <p>21 MS. DONNELL: Okay. All right. Well, I will --</p> <p>22 we'll proceed with the deposition, understanding</p> <p>23 that you've asserted that privilege, but for</p> <p>24 purposes of my -- I'd like to make a record, then.</p> <p>25 Ask just a few questions.</p>

<p>1 BY MS. DONNELL:</p> <p>2 Q So Detective Antonini, are you -- on the 3 break, did you discuss with your attorney your testimony 4 pertaining to how you conduct strip searches for the 5 Mount Vernon Police Department?</p> <p>6 MR. BUSHNELL: Objection. That's --</p> <p>7 MS. DONNELL: And that -- and you're asserting 8 an attorney-client privilege communication?</p> <p>9 MR. BUSHNELL: I am.</p> <p>10 BY MS. DONNELL:</p> <p>11 Q Okay. And Detective Antonini, are you going 12 to follow your Counsel's advice and not answer that 13 question?</p> <p>14 A Correct.</p> <p>15 Q Detective Antonini, are you in any way -- 16 well, let's strike that. But pursuant to your 17 communication with your Counsel, are you wanting to 18 clarify, modify, or change your prior testimony with 19 respect to strip searches you conducted for the Mount 20 Vernon Police Department?</p> <p>21 MR. BUSHNELL: Objection. You can answer.</p> <p>22 A No.</p> <p>23 Q Okay. Have you ever conducted a strip search 24 during your employment at the Mount Vernon Police 25 Department of an individual without your supervisor</p>	<p>Page 90</p> <p>1 A Correct.</p> <p>2 Q Okay. And have you ever had occasion, then, 3 to want to -- to believe that you needed to conduct a 4 strip search out in the field, and you didn't have a 5 supervisor present?</p> <p>6 A Absolutely not.</p> <p>7 Q Why not?</p> <p>8 A Because we don't do strip searches without the 9 supervisor being present or at the field, as you -- when 10 you say the field, what do you mean? Like in the 11 streets? Open view --</p> <p>12 Q In the streets, or at an apartment, or at some 13 location -- in the field, I mean, anything other -- any 14 place other than the Mount Vernon Police Department?</p> <p>15 A So, no, we don't do strip searches without the 16 supervisor being there.</p> <p>17 Q Okay. So your testimony is you've never 18 conducted a strip search of an individual without having 19 your supervisor physically present, correct?</p> <p>20 MR. BUSHNELL: Objection -- objection. Asked 21 and answered. You can answer it again.</p> <p>22 A Correct.</p> <p>23 Q Have you ever conducted a strip search without 24 obtaining prior approval from your supervising officer?</p> <p>25 A No.</p>
<p>1 being physically present?</p> <p>2 A No.</p> <p>3 Q That's never happened?</p> <p>4 A No.</p> <p>5 Q In the narcotics unit, is the sergeant 6 supervising officer always out on the street with the 7 unit?</p> <p>8 MR. BUSHNELL: Objection. You can answer.</p> <p>9 A Most times. Yes.</p> <p>10 Q Does the unit travel together in multiple cars 11 or do you have different assignments -- you were 12 dividing the officers among different assignments?</p> <p>13 A Multiple cars.</p> <p>14 Q But are you all doing the same thing or are 15 you doing different investigations?</p> <p>16 A Depends what individual detectives or 17 investigators are investigating at the time.</p> <p>18 Q So sometimes the narcotics unit operates 19 together all as a unit in multiple cars, and sometimes 20 you each do different assignments?</p> <p>21 A Correct.</p> <p>22 Q Okay. So have there been times when you've 23 been on assignment with another narcotics officer, and 24 the supervisor -- supervising officer, is not with you 25 and your other narcotics officers?</p>	<p>Page 91</p> <p>1 Q That's never happened?</p> <p>2 MR. BUSHNELL: Objection. Asked and answered.</p> <p>3 Go ahead.</p> <p>4 A No.</p> <p>5 Q Has Sergeant Fegan been present when you 6 conducted strip searches?</p> <p>7 A Yes.</p> <p>8 Q How many times?</p> <p>9 A Pretty much every single one of my strip 10 searches.</p> <p>11 Q So any time that you've conducted a strip 12 search, Sergeant Fegan was the supervising officer of 13 that search?</p> <p>14 MR. BUSHNELL: Objection. Go ahead.</p> <p>15 A For the vast majority of my strip searches.</p> <p>16 Yes.</p> <p>17 Q I forgot to say this earlier. If, over the 18 course of the deposition, your memory is refreshed and 19 you want to modify your testimony, you can let me know 20 and I'd be happy to let you do that. So for example, if 21 I'm asking you a lot of questions about strip searches, 22 you remember what -- how many you conducted or how many 23 Sergeant Fegan was present for, you can let me know.</p> <p>24 Okay?</p> <p>25 A Okay.</p>

Page 94

1 Q All right. Any other supervising officer that
 2 you recall being present for a strip search you've
 3 conducted, other than Sergeant Fegan?

4 A Well, we've -- we said before how many
 5 different supervisors I had in the unit, right? So
 6 Sergeant Anthony McEachin, Sergeant Anthony Mitchell,
 7 Sergeant Daniel Fischer, at the time, and Sergeant
 8 Fegan.

9 Q So each one of those supervisors was present
 10 for a strip search you conducted, is that your
 11 testimony?

12 MR. BUSHNELL: Objection. You can answer it.

13 A All supervisors were always present for strip
 14 searches.

15 Q My question's a little bit different and maybe
 16 you've already answered it. But just so the record's
 17 clear, are you testifying that you conducted strip
 18 searches, and each of those supervising officers that
 19 you previously identified, were present for at least one
 20 of your strip searches?

21 A Were -- all of our strip searches were
 22 conducted under the supervision of a supervisor.

23 MR. BUSHNELL: That's not what she's asking.

24 Q That's not what I'm asking. Yep. I'm asking
 25 something different. So I'm asking you whether Sergeant

Page 96

1 A I guess you can, based on the reports.

2 Q So is it accurate to say that anytime you
 3 conducted a strip search, you documented it in a police
 4 report?

5 A Yes.

6 Q When you were with the New York Police
 7 Department did you conduct any strip searches?

8 A I don't recall NYPD, yeah. And every search
 9 that was conducted was done in -- I don't think we did
 10 any strip searches at that time, no.

11 Q Okay.

12 A In NYPD, no.

13 Q So to the best of your ability, your testimony
 14 is that you don't remember conducting any strip searches
 15 during the time you worked as a police officer with the
 16 New York Police Department, correct?

17 A That is correct.

18 Q Okay. How about when you were assigned to the
 19 patrol division with the Mount Vernon Police Department?
 20 During the time you were on patrol, did you conduct any
 21 strip searches?

22 A The searches, especially for patrol, they are
 23 done in the cell block, and everything is always
 24 recorded in front of the supervisor. So all of our
 25 searches were done in -- especially in patrol uniform,

Page 95

1 Vincent Stufano -- well, you never worked under him.
 2 That's when you were on modified duty, correct?

3 A Correct.

4 Q Did Sergeant Anthony Mitchell supervise any of
 5 your strip searches?

6 A I -- if I recall, yes.

7 Q How many?

8 A I can't put a number because so -- long time
 9 ago and we only worked together for such a short period
 10 of times.

11 Q How about Sergeant Anthony McEachin? Or
 12 McKeow -- I'm saying that -- I might not be saying that
 13 right. But did he, Sergeant McEachin supervise any
 14 strip searches you performed?

15 A I believe so. Yes.

16 Q How many?

17 A Can't tell you a number.

18 Q Was it more than ten?

19 A Again, I can -- that's not something I keep a
 20 number of.

21 Q Would it be possible to ascertain how many
 22 strip searches you have performed as a Mount Vernon
 23 Police Officer, because every time you performed one,
 24 you documented it in a case report?

25 MR. BUSHNELL: Objection. You can answer.

Page 97

1 all of the searches are done in front of the supervisor.
 2 Q And is it fair to say -- I mean, I'm not sure
 3 if this is accurate, but are you testifying that when
 4 you did a -- you're testifying first that yes, you did
 5 do strip searches while you were a patrol officer with
 6 Mount Vernon Police Department, correct?

7 A Yes.

8 Q Okay. Do you know how many you did as a
 9 patrol officer before you got to narcotics?

10 A Again, you're asking me to put a number on
 11 something I can't.

12 Q Okay. When you were a patrol officer, did you
 13 also document in a police report that you conducted a
 14 strip search?

15 A Correct.

16 Q Okay. Did you conduct more strip searches
 17 when you got to the narcotics unit than you conducted on
 18 patrol, or kind of the same frequency?

19 MR. BUSHNELL: Objection. You can answer.

20 A Well, I spent more time as a narcotics
 21 detective than I did as a patrol, so...

22 Q Understood. I guess what I'm saying is, let's
 23 say as a patrol officer, you were conducting strip
 24 searches X amount of times per week. And as a narcotics
 25 officer, you were doing more, or less, or the same per

Page 98

1 week. Are you able to say?

2 MR. BUSHNELL: Objection. You can answer.

3 A No.

4 Q Do you think patrol officers are conducting
5 strip searches just as frequently as narcotics officers
6 for the Mountain Vernon Police Department; if you know.

7 MR. BUSHNELL: Objection. You can answer that.

8 A I can't say.

9 Q Where were you first trained how to conduct a
10 strip search?

11 A Where was I first trained?

12 Q Yes.

13 A That's hard to say. I want to say -- however
14 we were trained in the police academy in NYPD and
15 whatever training we had in Mount -- I had in Mount
16 Vernon. So to say how and when, it's hard for me to
17 answer that.

18 Q Okay. Maybe I'll break it down. Did you
19 receive training when you went to the academy, before
20 when you were a New York -- NYPD officer, on how to
21 conduct strip searches?

22 A I believe I did. Yes.

23 Q Do you know for sure or are you guessing?

24 A It's hard for me to -- I'm talking about,
25 what, 2000 -- what, '15, '16?

Page 99

1 Q I know. That's what I'm saying. That's what
2 I'm saying. I know -- I want you to tell me whether you
3 have a -- again, I'm not -- there's no fault. It's just
4 whether you actually remember or not. I'm just saying,
5 do you have an actual memory of being trained on how to
6 conduct strip searches at the academy, when you were
7 being trained as a New York Police Department officer?

8 A No. I don't have a memory of it.

9 MR. BUSHNELL: So Camilo, she -- as she says --
10 Heather has said multiple times, you're only
11 testifying to what you can remember, what you can
12 testify to, what you remember today. Okay?

13 THE WITNESS: So yeah, I don't --

14 MR. BUSHNELL: No guessing, nothing like that.

15 THE WITNESS: I don't know.

16 MR. BUSHNELL: All right.

17 BY MS. DONNELL:

18 Q Yeah. So we don't want you to guess. You
19 know, I don't want you to guess or speculate. I want
20 you to tell me what, you know, what you remember. And
21 sometimes it's not clear, and obviously I'm asking
22 questions from a long time ago, and sometimes you just
23 don't remember. And if you don't, you can just say, I
24 don't remember. So it's -- I think that your testimony
25 is that you don't remember whether you received training

Page 100

1 on how to conduct strip searches, when you went to the
2 academy before becoming a New York Police Officer?

3 A Correct.

4 Q Okay. Do you have an actual memory of being
5 trained on how to conduct strip searches, when you
6 received that training, when you came to Mount Vernon?

7 A I don't remember.

8 Q Okay. Do you remember receiving any
9 on-the-job training, observing other officers conduct
10 strip searches, when you got to Mount Vernon?

11 A I don't remember.

12 Q Okay. I think you got into this a little bit
13 already, but I want you to explain the criteria or
14 factors you considered as an officer, to determine
15 whether or not you were going to conduct a strip search
16 of an individual. So can you tell me all the factors
17 you considered?

18 A Historical, severity of the crime, charges of
19 the individual being arrested. I mean, it varies of --
20 you know, how you -- why you want to conduct a strip
21 search.

22 Q Okay. So the things you told me is
23 historical, severity of the crime, charges of the
24 individual, and then you said it varies on the
25 situation. But are there any other factors you

Page 101

1 considered before determining that you would conduct a
2 strip search of an individual? Other than what you've
3 just testified to?

4 MR. BUSHNELL: Objection. You can answer it.

5 A Factors such as what? If you don't mind me
6 asking?

7 Q No. I'm asking you. The factors -- I'm
8 sorry. The way the deposition proceeds is that I ask
9 the questions and you give answers, but I can clarify my
10 question for you, which is --

11 A Please.

12 Q Okay. Sounds good. I -- my question to you
13 is, all of the factors you consider before deciding that
14 you're going to conduct a strip of an individual that's
15 in your custody -- can you please identify all the
16 factors you consider?

17 A I guess, severity of the crime, historical --
18 you know, charges of the individual being arrested, you
19 know --

20 Q Okay. That's fair enough. So you've
21 described these three. So when you say, "Historical,"
22 what do you mean by that? Can you please describe?

23 A Maybe the individual has a history of hiding
24 weapons and, you know, concealing the weapons rather
25 than having them in a pocket. And maybe they'll place

Page 102

1 them in areas where they don't want law enforcement to
 2 find them. If there's a historical [sic] of that then,
 3 you know, that might call for a strip search to make
 4 sure there's no weapons hiding. That's an example.

5 Q Any other examples that you consider under the
 6 historical factor?

7 A No. That's pretty much it.

8 Q Okay. So you described a history of hiding or
 9 concealing weapons, that is known to the officer, right?

10 A Correct.

11 Q Okay. And did you also say hiding -- a
 12 history of hiding contraband or just weapons?

13 A Both.

14 Q Both.

15 A Could be both, yeah.

16 Q Okay. Okay. Then you said, "Severity of the
 17 crime." What do you mean by that?

18 A If you have an individual that might have, you
 19 know, just assaulted somebody -- you know, committed a
 20 felony crime and...

21 Q So is it fair to say that when you're talking
 22 about the severity of the crime, the more violent the
 23 crime, the more that factor weighs in favor of doing a
 24 strip search?

25 A Correct. And also historical. They may -- I

Page 103

1 mean, you could have an individual that could -- might
 2 have just had a DUI crash, under arrest, you know, you
 3 kind of take that into account. Then you conduct your
 4 regular search because the individual's being placed
 5 under arrest, but you know --

6 Q Does a -- I'm sorry. I'm sorry. I didn't
 7 mean interrupt you. Did you finish your answer?

8 A I did.

9 Q Like somebody who's being arrested for a
 10 felony DUI, is that a kind of severity of a crime that
 11 you would conduct a strip search?

12 A Possibly not, no.

13 Q Why not?

14 A Not that, but I -- then again, probably you
 15 only have one, if not any DUIs or DWIs in my career, any
 16 arrests like that, but -- you understand.

17 Q Okay. How about if someone's being arrested
 18 for a narcotics offense? Does just the fact that
 19 someone's being arrested for a narcotics offense mean
 20 that they should be strip-searched?

21 MR. BUSHNELL: Objection. You can answer.

22 A Not necessarily. No.

23 Q So when you're, as a narcotics officer,
 24 arresting someone for -- you believe they've committed
 25 some sort of narcotics offense, what factors do you

Page 104

1 weigh into determining whether to conduct a strip search
 2 or not?

3 A Severity of the crime. Historical. What do
 4 we know about the individual.

5 Q Okay. So severity of the crime, in terms of a
 6 narcotics offense -- what do you mean in the terms of a
 7 narcotics offense? Like, whether it's a trafficking
 8 charge, or a personal possession charge, or -- what
 9 weighs in a narcotics arrest situation?

10 A Misdemeanor possession versus a felony
 11 possession. You understand? Like, somebody that's
 12 caught for selling it versus somebody that's caught
 13 trying to use it.

14 Q So if it's a use or a possession, you're less
 15 likely to conduct a strip search versus trafficking or
 16 large quantities?

17 MR. BUSHNELL: Objection. You can answer.

18 A It, again, varies on the severity of the
 19 individual, the crime committed, or the historical --
 20 what we know about the individual.

21 Q Oka. How about if you have no historical
 22 information on the individual being arrested? You and
 23 your fellow officers never encountered the individual.
 24 So you have no historical information. What then do you
 25 use to consider whether or not a strip search is

Page 105

1 necessary?

2 MR. BUSHNELL: Objection. You can answer.

3 A You proceed with what knowledge you have of
 4 the individual.

5 Q So then does it just go to the severity of the
 6 offense?

7 MR. BUSHNELL: Objection.

8 A It could, but each situation will dictate.

9 Q Well, what other factors are you considering
 10 in this -- in the hypothetical where you have no
 11 historical information on the individual --

12 MR. BUSHNELL: Objection.

13 Q -- what other than the severity of the offense
 14 do you consider?

15 MR. BUSHNELL: Sorry. Objection. You can
 16 answer.

17 A Each situation will dictate. I mean, it
 18 doesn't --

19 Q Like what? I guess -- explain for me, when
 20 you say, the "situation will dictate," what you are
 21 thinking in your head?

22 A Well, for example -- an example, you arrest an
 23 individual that's very -- that's being very calm and
 24 collected. Listen, I'm sorry. You know, I didn't mean
 25 to do this X, Y, and Z. You know. I'm being with them

<p style="text-align: right;">Page 106</p> <p>1 -- listen, we're going to do a search. Is there 2 anything you have on you? The individual might come 3 forward, and says, listen, I don't have anything, but 4 you can search me. I'll do anything you want. So more 5 forthcoming then -- rather than you have an individual 6 that might be arrested for, you know, couple of, you 7 know, bags of -- let's say, in this example, crack. And 8 he might be combating, and screaming at you, and says, 9 I'm going to kill you. I'm going to kill you. Fuck 10 you. Fuck you. Well, then, don't worry about it. I'm 11 a get my knife and do this. And actually starts talking 12 about weapons in front of you, then you'll be more apt 13 to say, you know what? I think I'm going to have to 14 search you more in depth because I don't know, you might 15 have a weapon on you, and you are trying to hurt one of 16 us, or trying to hurt yourself in the process. So like 17 I said, situation will dictate.</p> <p>18 Q Okay. Understood. So some of those factors 19 mean the compliance of the individual and how 20 forthcoming they are, versus how combative and/or 21 threatening they are. That would be one factor you'd 22 consider in the --</p> <p>23 A That's a factor.</p> <p>24 Q -- an example. Another example might be if 25 the individual mentions a weapon or anything of physical</p>	<p style="text-align: right;">Page 108</p> <p>1 guns, or knives, or what were those? 2 A Both. 3 Q Okay. And how about front of the chest? What 4 kind of weapons have you found? 5 A Guns and knives. 6 Q Okay. And how about armpits? What kind of 7 weapons? 8 A Knives, contraband. 9 Q Knives and contraband. 10 A Weapons and contraband. 11 Q And you said, razor blades in the mouth and 12 razor blades on feet? 13 A Yes. 14 Q Any other -- have you ever found any weapons 15 secreted in someone's buttocks? 16 A There's been weapons that fell from the 17 buttocks. 18 Q Okay. What weapons have fallen from a 19 buttocks during the course of a strip search? 20 A Knives, usually. 21 Q Have you ever found a gun secreted in a 22 buttocks -- fallen out of a buttocks? 23 A No. But tucked in the waist-side, yes. But - 24 - 25 Q On the waist. Okay. Okay. Any other --</p>
<p style="text-align: right;">Page 107</p> <p>1 threat to you or your fellow officers, that would be a 2 factor you'd consider?</p> <p>3 A That is a factor. And again, whatever we know 4 about the individual, historical -- whether there's a 5 history of that.</p> <p>6 Q Yes, yes. This question was initially 7 prefaced with the hypothetical that you didn't have any 8 historical information, but understood. Okay. So let 9 me ask you this. Have you ever obtained a weapon when 10 conducting a strip search, that was secreted on an 11 individual's person?</p> <p>12 A Yes.</p> <p>13 Q Well -- okay. You have? Where -- what have 14 you obtained, weapon-wise?</p> <p>15 A Well, there's been weapons tied into their 16 inner thighs. There's been weapons tied into -- the 17 front of chest. There's been weapons tied underneath 18 the armpits. There's been razor blades inside the 19 mouth. There's been razor blades tucked underneath the 20 socks, or contraband, you know, for that matter. There's 21 been --</p> <p>22 Q Yeah, sorry. I was just talking about weapons 23 first, but then you can tell me contraband. So weapons, 24 you've found -- have you found -- so you found razor 25 blades. When you found weapons on the thigh, were those</p>	<p style="text-align: right;">Page 109</p> <p>1 okay. So how about contraband? Have you found 2 contraband secreted on somebody's person in the course 3 of a strip search?</p> <p>4 A Yes.</p> <p>5 Q What kind of contraband?</p> <p>6 A Crack. Heroin. Marijuana, when -- when it 7 was illegal.</p> <p>8 Q Yeah. Right. Understood. Yes.</p> <p>9 A I mean, coke, PCP.</p> <p>10 Q Where -- have you found drugs, narcotics or 11 the contraband you -- sorry, strike that. The 12 contraband you've just identified, being largely 13 narcotics, have you found that secreted in individuals' 14 mouths?</p> <p>15 A Yes.</p> <p>16 Q Okay. And you found that when you requested 17 them to open their mouth?</p> <p>18 A Yes.</p> <p>19 Q Okay. Have you found contraband such as you 20 just described secreted in anybody's buttocks?</p> <p>21 A Yes.</p> <p>22 Q How about their anal cavity?</p> <p>23 A Tucked inside?</p> <p>24 Q Uh-huh.</p> <p>25 A Well, if you -- if we can't see it, we can't</p>

Page 110

1 assume that there isn't anything in there.
 2 Q So I'm saying when you found it in somebody's
 3 buttocks -- not -- contraband in somebody's buttocks,
 4 has it just been in between their crack? Not inside
 5 their anus?

6 A Between the ass cheeks.

7 Q Okay. Have you -- and have -- where have you
 8 -- that's come out when they've squatted and coughed, or
 9 you've observed it on physical inspection, or both? I
 10 mean, on visual inspection or both?

11 MR. BUSHNELL: Objection. You can answer.

12 A So I guess that's the purpose of having the
 13 individual squat down and cough. Assuming it's because
 14 the reaction of the cough will loosen the muscle. And
 15 whatever is being held by the ass cheeks per se, will
 16 usually just fall into the ground. Again, that's why we
 17 ask individuals who are being strip-searched to squat
 18 down and cough.

19 Q Have you ever have seen or been made aware
 20 that the individual that's being strip-searched has the
 21 contraband partially in their anal cavity, such as like
 22 in a plastic bag, and so it doesn't fall out when you
 23 ask them to squat or cough, but yet you know that
 24 there's a plastic bag partially inserted into their anal
 25 cavity?

Page 111

1 MR. BUSHNELL: Objection. You can answer.

2 A Inserted into where? Like their --

3 Q Their anal cavity. Yeah. Have you ever done
 4 an inspection where you ask them to squat and cough, it
 5 doesn't fall out, but you can see that there might be
 6 something still secreted or partially secreted in their
 7 buttocks or anal cavity?

8 A We -- if we don't see it, we -- that's -- you
 9 know, we can't assume. But you're saying that -- if
 10 there's a visual of it?

11 Q Yeah. Like you were able to observe -- I'm
 12 asking if you've ever observed somebody having drugs in
 13 their anal cavity -- let's say in a plastic bag,
 14 partially inserted into their anal cavity. Have you
 15 ever observed that?

16 A I'm sure there's been cases, but I don't
 17 recall having --

18 Q Okay. Have you ever requested somebody --
 19 sought a warrant for someone to have a cavity search
 20 performed by a medical professional?

21 A Have I ever had a search warrant for somebody
 22 to be --

23 Q Taken to have a medical professional search
 24 them?

25 A I've never have -- I've never had to come into

Page 112

1 that situation.

2 Q Okay. Are you aware of any investigation in
 3 which any of your narcotic officer colleagues sought a
 4 warrant for a cavity search?

5 MR. BUSHNELL: Objection. You can answer.

6 Q If you know?

7 A No.

8 MS. DONNELL: Okay. Okay. So let's see. I'm
 9 going to have -- so let me just see what I
 10 previously marked this exhibit as. But Steve, I'm
 11 going to show him the 3.045. I just can't remember
 12 what I designated it previously, so just --

13 MR. BUSHNELL: 2 and 3, it looks like.

14 BY MS. DONNELL:

15 Q Okay, sure. Just give me one minute. Okay.
 16 Yes. Okay. So I'm going to have you look at, Detective
 17 Antonini, what I previously designated as Exhibit 2 to
 18 your deposition, which is the procedure number 3.045
 19 that was produced in this litigation by the City of
 20 Mount Vernon. And it has a date of being issued on
 21 January 4, 1993, effective January 18, 1993. Do you
 22 have that in front of you?

23 (EXHIBIT 2 MARKED FOR IDENTIFICATION)

24 A Yes.

25 Q Okay. And it's a two -- let's see. No, it's

Page 113

1 a three-page document, correct?

2 A Yes.

3 Q Okay, great. Are you familiar with what I've
 4 designated as Exhibit 2 to your deposition?

5 A It says, the policies and procedures for
 6 search of arrested persons?

7 Q Yes. Are you familiar with that document?

8 A Yes.

9 Q Is this one of the documents you looked at to
 10 prepare for your deposition today?

11 A Yes.

12 Q Prior to reading this -- or reviewing Exhibit
 13 2 to prepare for your deposition, when was the last time
 14 you have seen this document; if you know?

15 A Can't say.

16 Q Okay. Do you know if you ever saw it prior to
 17 your -- preparing for your deposition?

18 A I am sure I have. Yes.

19 Q Do you have a specific recollection of when
 20 that was?

21 A No recollection of when it was, no.

22 Q So you see here, I'm going to -- well, I guess
 23 you can't see, but do you see in the -- under the
 24 subject it says, "Search of arrested persons", and then
 25 the first subheading is "Purpose", right?

1 A Yes.
 2 Q Okay. And this says at the -- the first line
 3 says, "The manual of procedures provides for the
 4 thorough search of all arrested persons," correct?
 5 A Yes.
 6 Q And then the next line says, "However, a
 7 person arrested will not be subject to a full strip
 8 search unless there is a rational basis for doing so,"
 9 correct?
 10 A Correct.
 11 Q Okay. And then it says, "To maximize security
 12 and minimize hazards to the arresting officer, the
 13 arrested person," and the department, these are the
 14 guidelines, right?
 15 A Yes.
 16 Q So the -- let's go down to procedure. The
 17 procedure initially has frisk and field searches, right?
 18 A Yes.
 19 Q Okay. And the frisk is defined in this policy
 20 to be, "Performed primarily to ensure the personal
 21 safety of the arresting officer." And, "Is a
 22 methodical, external body examination of the arrested
 23 person conducted immediately after apprehension to find
 24 weapons, evidence, or contraband," right?
 25 A Yes.

1 Q And this is to be conducted before or just
 2 immediately after the subject is handcuffed in the rear,
 3 and it's a, "Feeling for weapons or other objects, with
 4 special attention to the waistband, armpit, collar, and
 5 groin areas," right?
 6 A Yes.
 7 MR. BUSHNELL: Just for the record, it's not a
 8 verbatim recitation of the policy, but it's --
 9 MS. DONNELL: Yeah, that's true. That's fair.
 10 Thank you.
 11 MR. BUSHNELL: Okay.
 12 BY MS. DONNELL:
 13 Q And then it says, a frisk or pat down may be
 14 conducted, "By an officer, regardless of sex," that has,
 15 "Reasonable suspicion to stop a person, where the stop
 16 indicates a search is proper," right?
 17 A Yes.
 18 Q And then under subsection -- that was
 19 subsection A. And subsection B says, "By the arresting
 20 officer, regardless of sex, where there is a lawful
 21 arrest on probable cause," correct?
 22 A Yes.
 23 Q Okay. And then if there's two officers
 24 present and one is of the same sex, of the person -- the
 25 person detained, "That officer should conduct the

1 frisk," correct?
 2 A Correct.
 3 Q Then the policy says, at the bottom of page 1,
 4 "In either case, where a more extensive search is called
 5 for, the subject should be brought into the station and
 6 Section B rules, 'Search at police facility,' should be
 7 followed." Do you see that?
 8 A Yes.
 9 Q Okay. And then subsection D at the top of
 10 page 2 says, "Where there is no probable cause to stop
 11 or arrest a person, there is no basis to justify any
 12 search of a person." Do you see that?
 13 A Yes.
 14 Q Okay. Now, let's go down to the search of the
 15 police facility. Here, it says -- it's under number
 16 two. "Upon arrival at police headquarters or other
 17 department facility, the arresting officer or a
 18 designated member of the same sex as the prisoner, will
 19 conduct a thorough search of the subject's person
 20 clothing to ensure the safety of all persons within the
 21 facility and to remove weapons, contraband," or --
 22 "Evidence not discovered by the frisk," right?
 23 A Yes.
 24 Q "Other items lawfully carried, but are
 25 dangerous to life, or which could facilitate escape or

1 deface or damage property, will also be removed from the
 2 subject," right?
 3 A Yes.
 4 Q And then the policy goes on in section three
 5 to say, a search at the police facility, not a 'Strip
 6 search,' includes the removal of outer garments, such as
 7 overcoats, jackets, sweaters, vests, hats, wigs, ties,
 8 belts, shoes, and socks, handbags, and wallets," right?
 9 A Yes.
 10 Q And that, "Pockets are to be emptied," right?
 11 A Right.
 12 Q Okay. And then you search the person by not
 13 removing their clothing, but "Grabbing, crushing, and
 14 squeezing garments," and sliding your body -- hands over
 15 the body to detect any objects, right?
 16 A Right.
 17 Q Okay. Then it goes on in the next section to
 18 describe a strip search, right?
 19 A Right.
 20 Q Now I -- I have a question for you. When you
 21 just arrest an individual out on the street, and you
 22 bring them into the station, and they're just going to
 23 be processed, and put into custody, do you always
 24 conduct a strip search as a narcotics officer? Or do
 25 you sometimes just turn them over to the lock up keeper

<p style="text-align: right;">Page 118</p> <p>1 or the desk (phonetic) sergeant for processing?</p> <p>2 MR. BUSHNELL: Objection. You can answer.</p> <p>3 A We conduct our own searches in our office.</p> <p>4 Q For every single arrest you make?</p> <p>5 A No, not every single arrest. It was like --</p> <p>6 like we mentioned before, the severity of the crime will</p> <p>7 call for or dictate whether we need to do a full,</p> <p>8 thorough strip search or just (sound effect). And then</p> <p>9 whether that search is conducted in our office, since we</p> <p>10 have our own holding cell, or the individual that's</p> <p>11 being arrested may have not deemed, you know, a full,</p> <p>12 crazy search, just bring them downstairs to the cell</p> <p>13 block, being processed there, then put in a holding</p> <p>14 cell.</p> <p>15 Q So it's fair to say sometimes individuals are</p> <p>16 taken into custody, arrested by the narcotics unit,</p> <p>17 they're frisked -- I mean, they're patted down and</p> <p>18 searched, but there's no strip search conducted,</p> <p>19 correct?</p> <p>20 A Correct.</p> <p>21 Q Are you able to say what percentage of arrests</p> <p>22 the narcotics unit made where a strip search was</p> <p>23 conducted versus not conducted?</p> <p>24 MR. BUSHNELL: Objection.</p> <p>25 Q Like 50 percent of the time, or...?</p>	<p style="text-align: right;">Page 120</p> <p>1 the reasonableness of" such a search under the</p> <p>2 circumstance will control, right?</p> <p>3 A Right.</p> <p>4 Q And then, "A, 'Strip search,' will be</p> <p>5 conducted by a member of the same sex as the arrested</p> <p>6 person in a secure area in uttermost privacy and with no</p> <p>7 other arrestee present," correct?</p> <p>8 A Correct.</p> <p>9 Q And it should be -- "It should not be</p> <p>10 necessary to touch the subject's body, except for</p> <p>11 examination of the hair," correct?</p> <p>12 A Correct.</p> <p>13 Q "If a 'Strip search,' is conducted, such</p> <p>14 information will be entered under, 'Details,' in the</p> <p>15 arrest book," right?</p> <p>16 A Right.</p> <p>17 Q What is the arrest book?</p> <p>18 A What is the arrest book?</p> <p>19 Q Yeah.</p> <p>20 A It's a book that the patrol division is kept</p> <p>21 in the cell block (phonetic).</p> <p>22 Q And earlier you testified that you would</p> <p>23 document if you did a strip search in a police report,</p> <p>24 right?</p> <p>25 A I'm sorry. Repeat that question?</p>
<p style="text-align: right;">Page 119</p> <p>1 MR. BUSHNELL: Objection. You can answer, if</p> <p>2 you can.</p> <p>3 A I can't answer that.</p> <p>4 Q Can't answer that. Okay. All right. So --</p> <p>5 okay. So under the strip search, the policy says that</p> <p>6 "the desk officer or supervisor present will decide if a</p> <p>7 strip search should be conducted and is responsible that</p> <p>8 the search is conducted properly." Do you see that?</p> <p>9 A Yes.</p> <p>10 Q "A, 'Strip search,' will be utilized when the</p> <p>11 arresting officer reasonably suspects that weapons,</p> <p>12 contraband, or evidence may be concealed upon the person</p> <p>13 or in their underclothing, in such a manner that they</p> <p>14 may not be discovered by the previous search methods."</p> <p>15 Do you see that?</p> <p>16 A Yes.</p> <p>17 Q It says, "Other factors that should be</p> <p>18 considered in determining the necessity for a 'Strip</p> <p>19 search' include the nature of the crime; serious,</p> <p>20 violent felony; arrest circumstances; subject's</p> <p>21 reputation; extremely violent person; act of violence;</p> <p>22 and discoveries from previous searches," right?</p> <p>23 A Yes.</p> <p>24 Q Okay. And then the policy says that</p> <p>25 "determining whether a, 'Strip search,' is necessary,</p>	<p style="text-align: right;">Page 121</p> <p>1 Q I'm sorry. Earlier you testified that if you</p> <p>2 conducted a strip-search, you would document it in your</p> <p>3 police report, correct? The case report?</p> <p>4 A I -- correct.</p> <p>5 Q Did you ever document that you conducted a</p> <p>6 strip search in an arrest book?</p> <p>7 A No.</p> <p>8 Q So that --</p> <p>9 A And I don't -- and to my -- I don't think that</p> <p>10 the department keeps an arrest book in the cell block</p> <p>11 anymore --</p> <p>12 Q Okay.</p> <p>13 A -- to my knowledge.</p> <p>14 Q And then subsection four C says, "A</p> <p>15 subsequent, 'Strip search,' will not be conducted unless</p> <p>16 there is a reasonable belief that the subject has</p> <p>17 acquired a weapon or contraband." Do you see that?</p> <p>18 A Yes.</p> <p>19 Q Do you take that to mean, that once an</p> <p>20 individual's been strip-searched a single occasion, they</p> <p>21 won't be strip-searched a second time, unless there's a</p> <p>22 belief that the subject acquired a weapon or contraband,</p> <p>23 subsequent to the original strip search?</p> <p>24 A I guess.</p> <p>25 Q Have you ever been involved in an -- having an</p>

Page 122	Page 124
1 individual be strip-searched more than once in your 2 presence, either by you or one of your fellow officers? 3 A Yes. 4 Q Okay. Tell me, do you -- was that on one 5 occasion or more than one occasion? 6 A Can't say. 7 Q Okay. But you -- your testimony is you have 8 been present for when a subject's been strip-searched 9 more than once; to your knowledge? 10 A Correct. 11 Q And you aren't able to say one way or the 12 other how often that has occurred? 13 A Oh, we -- we've -- I mean, this -- we've 14 arrested individuals on multiple occasions. 15 MR. BUSHNELL: So I think that's the problem. 16 MS. DONNELL: Oh, I'm sorry. Let me -- thank 17 you. Let me rephrase. 18 MR. BUSHNELL: All right. Didn't mean to jump 19 in there. 20 MS. DONNELL: Sorry, go -- Steve, I'm sorry I 21 interrupted you but I think I got -- understand. 22 MR. BUSHNELL: Yeah, I was about to jump in on 23 there. Yeah. If you want to reclarify and say -- 24 BY MS. DONNELL: 25 Q Sure, let me clarify the question for you,	1 Q Correct. 2 A Strip-searched multiple times? 3 Q Yeah. 4 A No. 5 Q Let's say once out in the field and then once 6 when you brought him to the station? 7 A Absolutely not. Never. 8 Q Never happened? Okay. All right. And then a 9 sub -- going down the policy for section -- paragraph 10 four D, it says, "A, 'Strip search,' will not be 11 conducted after a decision is made to avoid an arrest or 12 to release the prisoner immediately upon issuance of a 13 summons." Do you see that? 14 A Correct. 15 Q And then E says, "A thorough clothing search 16 will usually eliminate the necessity of a full, 'Strip 17 search,' for weapons, and ensure maintenance of safety 18 and security standards. However, a 'Strip search' for 19 other evidence may still be necessary in some 20 instances." Do you see that? 21 A Yes. 22 Q And did you follow that practice, like if you 23 do a thorough clothing search, you should be able to 24 find -- be able to feel, let's say, if there's a gun or 25 a knife on somebody's chest, or a gun or a knife in an
Page 123	Page 125
1 Detective Antonini. So, Detective Antonini, I'm asking 2 you in a -- during the course of a single arrest -- 3 A Okay. 4 Q -- have you been part of either yourself or 5 observing your fellow officers conduct a strip search of 6 the same subject during a single arrest? Not like one 7 time a month ago. 8 A Oh, no. 9 Q You have not? Okay. 10 A No. 11 Q So it's your testimony that when you've been 12 involved in a strip search of a subject during an 13 arrest, there's only been one strip search of that 14 subject? 15 A Correct. 16 Q Okay. So when you were testifying earlier, 17 you know of individuals who've been strip-searched more 18 than once, you mean on separate occasions -- on 19 different arrests? 20 A Correct. 21 Q So it's your testimony that you've never 22 strip-searched a single subject during one arrest, that 23 you've never participated in that? 24 MR. BUSHNELL: Objection. You can answer. 25 A Strip-searched on the same single incident?	1 armpit, or a gun or a knife in a waistband or in the 2 upper thigh? Usually if you're feeling so over 3 someone's clothing, you can find those, right? 4 MR. BUSHNELL: Objection to form. You can 5 answer. 6 A So if we -- if we found a gun on the armpit, 7 that doesn't mean that we stop searching. 8 Q Right. But like you could -- if somebody has 9 a gun under their armpit, you can usually feel that when 10 you're feeling over their clothes, correct? 11 MR. BUSHNELL: Objection. You can answer. 12 A So we should stop searching everything else, 13 just because we found -- no. We conduct a full search 14 after that, yes. 15 Q Understood. But the -- I think I understand 16 what you're saying. You're saying if you find a gun 17 under the armpit, you might keep searching because there 18 might be one on the waistband, or a knife on the thigh. 19 You have to conduct a thorough search, no matter if you 20 find a weapon, right? 21 A Correct. 22 Q Okay. But my question is a little bit 23 different. My question is, as policy -- your policies 24 states, usually a thorough investigation of someone's 25 clothing will -- of -- find weapons that are on a

<p style="text-align: right;">Page 126</p> <p>1 person's body, right? You can usually feel it?</p> <p>2 MR. BUSHNELL: Objection -- objection. You can</p> <p>3 answer.</p> <p>4 A In some instances, yes.</p> <p>5 Q Okay. And so it -- usually, a thorough</p> <p>6 clothing search will eliminate the necessity of a full</p> <p>7 strip search. Would you agree with that?</p> <p>8 MR. BUSHNELL: Objection. You can answer.</p> <p>9 A In some instances.</p> <p>10 Q So you don't agree with that statement? Are</p> <p>11 you qualifying?</p> <p>12 A Not always.</p> <p>13 Q Okay. You can put Exhibit 2 down. Okay. I'm</p> <p>14 going to have you look at Exhibit 5. Does -- can Steve</p> <p>15 hand you what I previously designated as Exhibit 5 to</p> <p>16 your deposition? It's a one-page document, "Detective</p> <p>17 division operational procedures, search of individuals."</p> <p>18 It was issued on February 10, 2015.</p> <p>19 (EXHIBIT 5 MARKED FOR IDENTIFICATION)</p> <p>20 MS ACQUISTO: Is that the right one?</p> <p>21 MR. BUSHNELL: Exhibit 5, Detective --</p> <p>22 MS. DONNELL: It's at the --</p> <p>23 MR. BUSHNELL: Detective division oper --</p> <p>24 search of individuals?</p> <p>25 MS. DONNELL: Yeah.</p>	<p style="text-align: right;">Page 128</p> <p>1 MR. BUSHNELL: Objection. You can answer.</p> <p>2 A No.</p> <p>3 Q Do you remember -- do you have a specific</p> <p>4 memory of receiving any training on when it became --</p> <p>5 when it became issued in February, 2015?</p> <p>6 A No.</p> <p>7 Q But you were a narcotics officer at that time,</p> <p>8 correct?</p> <p>9 A Correct. Yes.</p> <p>10 Q And you were working under Sergeant Sean</p> <p>11 Fegan, correct?</p> <p>12 A At the time, 2015? Yes.</p> <p>13 Q Okay. Okay. And here it says -- this is the</p> <p>14 subject matter of this operational procedures is the</p> <p>15 search of individuals, right?</p> <p>16 A Yes.</p> <p>17 Q And it says that members are guided by the</p> <p>18 department manual" -- "Operational procedure number</p> <p>19 3.045, search of arrested persons." That's what we just</p> <p>20 looked at in Exhibit 2, right?</p> <p>21 A Yes.</p> <p>22 Q And then it says, in the event of a deviation</p> <p>23 from this policy -- "In the event that a deviation from</p> <p>24 this policy is required," a "strip search becomes</p> <p>25 necessary, the following procedure will apply." Do you</p>
<p style="text-align: right;">Page 127</p> <p>1 MR. BUSHNELL: SOP 16?</p> <p>2 MS. DONNELL: You got it.</p> <p>3 MR. BUSHNELL: Thanks.</p> <p>4 MS. DONNELL: Okay. And I previously</p> <p>5 designated this as Exhibit 5 to the deposition.</p> <p>6 MR. BUSHNELL: Yep.</p> <p>7 BY MS. DONNELL:</p> <p>8 Q Okay. Okay. Detective Antonini, do you have</p> <p>9 Exhibit 5 in front of you?</p> <p>10 A I do.</p> <p>11 Q Okay. Do you recognize Exhibit 5?</p> <p>12 A Yes.</p> <p>13 Q Did you look at Exhibit -- the -- the --</p> <p>14 designated as Exhibit 5 to prepare for your deposition</p> <p>15 today?</p> <p>16 A Yes.</p> <p>17 Q Prior to looking at Exhibit 5, the Detective</p> <p>18 division operational procedures for search of</p> <p>19 individuals to prepare for your deposition, when's the</p> <p>20 last time you saw it; if you remember?</p> <p>21 A I don't remember.</p> <p>22 Q Do you have an actual memory of being trained</p> <p>23 -- well, do you remember why this detective division</p> <p>24 operational procedure 16 came into effect? Do you have</p> <p>25 any memory as to the history of it?</p>	<p style="text-align: right;">Page 129</p> <p>1 see this?</p> <p>2 A Yes.</p> <p>3 Q Okay. And then it says a, "Member will</p> <p>4 conduct the search of," an arrested person, "In the cell</p> <p>5 block whenever possible," right?</p> <p>6 A Yes.</p> <p>7 Q Is that your understanding, that strip</p> <p>8 searches were supposed to be conducted at the station,</p> <p>9 in a cell block, whenever possible?</p> <p>10 A Whenever possible.</p> <p>11 Q Was that your understanding?</p> <p>12 A Yes. Whenever possible.</p> <p>13 Q Okay. When was it not possible to transport</p> <p>14 an arrestee to the station to conduct a strip search at</p> <p>15 the department --</p> <p>16 MR. BUSHNELL: Heather, I think you're cutting</p> <p>17 out a little bit there.</p> <p>18 MS. DONNELL: Oh, sorry. I'm so sorry.</p> <p>19 MR. BUSHNELL: Could you repeat that?</p> <p>20 MS. DONNELL: Okay. Yeah, you were looking at</p> <p>21 me, and I was like, did he -- okay. Sorry. I'll</p> <p>22 say it again.</p> <p>23 BY MS. DONNELL:</p> <p>24 Q Can you hear me now?</p> <p>25 A Yes.</p>

Page 130

1 Q Okay. When was it not possible to bring an
2 individual to the station to be strip-searched?

3 A There's situation -- well, the -- like I said,
4 the situation would dictate. Like, we could have a --
5 like, specifically to search warrants is pretty much
6 what this is -- applies to. So if we are in a location
7 where we're conducting a search warrant of an apartment
8 and there's an individual where we could conduct a strip
9 search at that location, it'll be conducted there.
10 Obviously under the supervision of our supervisor, and
11 obviously with camera in place to do it, you know, as
12 per procedure.

13 Q Did you ever conduct a -- did you find it
14 justified to conduct a strip search out on the street?

15 A Absolutely not.

16 Q Never happened?

17 A No.

18 Q How about -- so you're saying only -- you did
19 it in the field, only when it was pursuant to a warrant
20 to search a home or apartment? So you would do it at
21 the home where the apartment?

22 A So I get a little confused every time you say
23 on the field. So to be more specific, in closed
24 locations, like apartments, houses, where it's more of a
25 private -- "private setting" Nothing in the open of

Page 131

1 street.

2 Q What happens if you arrest somebody for -- on
3 the street? Like you observe them, and you believe you
4 have probable cause to arrest them for trafficking
5 narcotics, and they're out on the street. And you do a
6 pat down and you're concerned that they're secreting
7 weapons or contraband on their person? Do you --

8 A The strip search will be conducted back at
9 headquarters.

10 Q Okay. And for the individuals that are -- so
11 when you're saying you strip search people pursuant to a
12 search warrant for a home, or an apartment, or a
13 business, why do you not bring those individuals back to
14 strip search at the station?

15 A Because it's -- it -- I guess, like I said
16 before, the situation would dictate. Whereas, if it's
17 more convenient and easier to conduct a search at the
18 location, it's usually conducted there. Whereas, not to
19 repeat --

20 Q So the default was to conduct it on the
21 location? The default is if there's an enclosed space
22 that you could do it on location, you would -- the
23 default was to do it on location where the search was
24 being conducted?

25 A Correct. And then we don't have to repeat the

Page 132

1 process back at headquarters because you already
2 conducted the strip search.

3 Q Okay. And when you turn those persons over to
4 the watch commander or the jail, would you let them know
5 they have already been strip-searched, so they don't
6 have to be strip-searched again? Or would the people
7 putting them into the detention facility strip search
8 them again; if you know?

9 A No. They would not be strip-searched again.

10 Q Okay. So how would you convey that to -- when
11 you brought somebody in for processing, you would let
12 them know orally they had been strip-searched?

13 A The desk officer will respond back to the cell
14 block, in order to book the individual that's being
15 processed. Well, at that time, we'll tell the desk
16 officers if the individual's already strip-searched. No
17 need to conduct another search for. All his items have
18 been removed, he's clear, you know, deemed to be safe,
19 blah, blah. All he does after that is pretty much
20 conduct his evaluation of, you know, the individual
21 before he's placed into a cell block.

22 Q Okay. All right. So let's go through section
23 C [sic]. It says -- number two, it says that the "Strip
24 searches will be conducted in accordance with parameters
25 set forth in operational procedure 3.045," right?

Page 133

1 A Yeah.

2 Q And then it says, "In the event that a strip
3 search is conducted, a detective division supervisor
4 will be present and will direct one member to conduct
5 the search in a private room. A second member is to
6 video/audio record the subject being advised that he or
7 she will be strip-searched. The recording will continue
8 from outside the private room while the searching
9 officer and subject are inside. And, "Upon completion
10 of the search, the recording officer will conclude the
11 recording by asking the subject's name and inquiring of
12 the searching officer and subject if the search was
13 completed without incident and if any contraband was
14 recovered. This procedure will be followed in all
15 instances in which a strip search is conducted,
16 regardless of location." Do you see that?

17 A Yes.

18 Q Okay. And is that the policy that you
19 followed when you conducted strip searches?

20 A Yes.

21 Q Okay. When -- you said that the narcotics
22 office had a holding cell, right?

23 A We do.

24 Q Is that where the strip searches were
25 conducted when you -- when you did them at the station?

Page 134

1 A If we -- no. We have a private room inside
2 the narcotics office.

3 Q So the searches weren't conducted in the
4 holding cell, they were in the private room?

5 A Correct.

6 Q Where is the private room, inside the
7 narcotics office?

8 A Inside the narcotic office.

9 Q Well, what -- where? Tell me where.

10 A So if you were standing in the office right
11 now, there's a small, enclosed room in -- behind you in
12 the corner with a door.

13 Q Was the room used for anything else other than
14 strip searches?

15 A Interviewing, debriefing.

16 Q So it's like an interrogation room?

17 A No.

18 MR. BUSHNELL: Objection. Go ahead.
19 A No.
20 Q And what do you -- when you're saying
21 interviewing, you mean like interviewing witnesses or
22 subjects?

23 A Well, when you want to have a -- if you want
24 to debrief somebody quietly without having -- there's
25 some case instances where you have two different

Page 136

1 room, or what would you call them?

2 A Only one.

3 Q There's only one. Okay. So there's one
4 private room within the narcotics unit that can be used
5 for interviewing individuals privately, strip-searching,
6 right?

7 A Correct.

8 Q But then does the detective division have its
9 own separate office, where it has interrogation -- or
10 interview rooms or interrogation rooms?

11 A No. The division has its own interview rooms
12 where they conduct their own interview procedures or
13 interrogating room.

14 Q Okay. I know we talked about taking a -- like
15 a short lunch break shortly, but before we do, in --
16 this -- the incident we're -- was in November 2017,
17 right?

18 A (No verbal response.)

19 Q Do you remember the narcotics officers that
20 were part of the unit in November 2017, other than
21 yourself and Sergeant Fegan?

22 A Do I remember who was part of the unit?

23 Q Yeah.

24 A During -- Joseph Valente, Bobby Puff, Patrick
25 King. Can't think of anybody else who was in the unit

Page 135

1 individuals in the same office -- two without relation
2 to the other. So you want to have -- you want to
3 conduct your own interview with one individual in that
4 room, rather than have it in the open where the other
5 -- the other individual can hear what you are saying.

6 Q Maybe you can explain this to me. Does the
7 narcotics unit have an office that's within the
8 detective division?

9 A Our own separate office?

10 Q Yeah. Or are you just in the detective
11 division with all the other -- all the other kinds of
12 detectives?

13 A Yes. The narcotics unit has his own separate
14 office away from the detective division, yes.

15 Q And the narcotics officers, did you guys have
16 your own offices, or just desks, or lockers? What did
17 you as officers have in there?

18 A Open desk.

19 Q Open desks? And did the sergeant have -- was
20 there a sergeant's office -- or is there a sergeant's
21 office?

22 A Yes. He has his own separate office within
23 the narcotics office.

24 Q Within. Okay. And then how many private
25 rooms or interview -- would you call them an interview

Page 137

1 at that time.

2 Q How many -- did you guys have the same on and
3 off days, or did you -- well, let me strike that. How
4 many days a week did the narcotics unit operate back in
5 2017?

6 A How many days a week? I believe it was four
7 days on, two days off, four days on, three days off.

8 Q Did you guys have the same off days? What I'm
9 trying to understand is, was it operating seven days a
10 week and you guys rotated who was on and off? Or was it
11 operating like four days at a time then you all had two
12 days off, four days at a time, then you all had the same
13 three days off?

14 A Correct. It was a --

15 Q The latter?

16 A Four on, two off, four on, three off,
17 everybody.

18 Q So everybody always worked the same shifts and
19 then there'd be certain days a week there just wouldn't
20 be a narcotics unit operating?

21 A The same working hours, but -- the same shift,
22 but the different working hours, we would dictate what
23 time we were coming in for the next day, and so on, and
24 so forth. As long as we work the eight-hour shift.

25 Q But is it accurate to say that you guys would

Page 138

1 work the same four days, and then you'd have the same
 2 two days off, and there'd be no narcotics unit
 3 operating?

4 A Correct.

5 Q Okay. Is that same schedule true now; do you
 6 know?

7 A I don't know. Can't tell.

8 Q Okay. Got it.

9 MS. DONNELL: Okay. Let's do this. Let's go
 10 off the record and then Steven, maybe you and I can
 11 talk for just a minute.

12 MR. BUSHNELL: Sure.

13 VIDEOGRAPHER: Okay. We are going off record
 14 at 12:55 p.m.

15 (OFF THE RECORD)

16 VIDEOGRAPHER: All right. We are back on the
 17 record at 1:35 p.m.

18 BY MS. DONNELL:

19 Q Okay. Detective Antonini, I'm going to call
 20 your attention to what I previously designated as
 21 Exhibit 13 to your deposition, and it's the "defendants'
 22 limited disclosures," that were produced in this case on
 23 March 22, 2021. I think it's a six-page document, and
 24 it should be there for you.

25 (EXHIBIT 13 MARKED FOR IDENTIFICATION)

Page 139

1 A Okay.

2 Q Okay. Can you hear me okay? I just got a
 3 notation on my Zoom that I might not be being heard
 4 okay. Are you okay?

5 A I hear you okay.

6 Q Okay. Just let me know if something changes.
 7 Okay. So have you - well, are you familiar with the
 8 document that I've designated as Exhibit 13 to your
 9 deposition?

10 A Yes.

11 Q Okay. And have you looked at that before?

12 A Yes.

13 Q When's the last time you saw it?

14 A I can't recall. Earlier today, I think.

15 Q Earlier today?

16 A Yes.

17 Q Okay. Let's call - I'm going to have you turn
 18 to page 2 where it says, "Prior section 1983 lawsuits
 19 filed against and served on the defendants." Do you see
 20 that?

21 A Page 2? Which line?

22 Q Starting at the bottom, it's - there's
 23 paragraph five.

24 A Okay. I see it.

25 Q Okay. So this is listing some lawsuits - some

Page 140

1 lawsuits filed under section 1983 against you and other
 2 Defendants. And I want to go through the list of
 3 lawsuits that are here for - listed for you. Okay?

4 A Okay.

5 Q Okay. And if there's any additional ones that
 6 are not listed here, you can let me know, but let's
 7 start with the first one. The first is titled Cayruth
 8 versus - Cayruth? I think I'm saying that right, or do
 9 you say it a different way?

10 MR. BUSHNELL: You're saying that, right.

11 BY MS. DONNELL:

12 Q Cayruth, and I believe it's Komato [sic]
 13 Cayruth, v. the City of Mount Vernon, including you. Are
 14 you familiar with that lawsuit against you?

15 A I believe I am, yes.

16 Q Okay. And you know that that lawsuit makes an
 17 allegation of an unlawful strip search against you,
 18 correct?

19 A Correct.

20 Q Is that right?

21 A Yes.

22 Q Okay. And is that one of the cases - have you
 23 been deposed in that case?

24 A I believe I was, and this happened to me a
 25 long time ago.

Page 141

1 Q Okay. This involves a strip search where
 2 there was no arrest made; is that right?

3 A I believe so, yes.

4 Q Okay. Do you remember the search you
 5 conducted of Mr. Komato Cayruth?

6 A Do I remember the search?

7 Q Yes.

8 A No, I do not.

9 MR. BUSHNELL: Just for the record, Heather,
 10 it's Komanjo. K-O-M-A-N-J-O.

11 MS. DONNELL: Komanjo. Thank you. I'm sorry.

12 MR. BUSHNELL: No. You're welcome.

13 BY MS. DONNELL:

14 Q So as you sit here today, you have no
 15 recollection of your search of Mr. Cayruth?

16 A I don't remember.

17 MR. BUSHNELL: So also, I would just like to
 18 say, too, that this is an ongoing lawsuit currently,
 19 you know, to the extent that he's asked to testify
 20 about deposition testimony that he's already given
 21 that is going to be -- likely going to be the
 22 subject of an upcoming civil trial. He -- you can
 23 ask about the facts of the case, I think, but
 24 anything that goes into his deposition or anything
 25 like that, I would object to.

Page 142

1 MS. DONNELL: Well, I -- that's -- I think
 2 -- let's -- I'll take it question by question, but I
 3 think I can ask him -- I mean, obviously this is
 4 -- pertains to a -- not just a lawsuit, but also a
 5 civilian complaint.

6 MR. BUSHNELL: Right. And I don't -- I don't
 7 anticipate having any problems, Heather, but yeah,
 8 let's take question by question.

9 BY MS. DONNELL:

10 Q Okay. Okay. Well, for purposes of this
 11 portion of my questioning, you are a Defendant in the
 12 ongoing lawsuit by Mr. Cayruth, that pertains to
 13 allegations of an unlawful strip search, among other
 14 allegations, correct?

15 A Correct.

16 Q Okay. And as you sit here today, you don't
 17 remember whether you were deposed in that action?

18 A No. I don't remember the particulars about
 19 the incident.

20 Q You don't -- I'm sorry. Thank you. So you
 21 don't remember the particulars of the strip search that
 22 Mr. Cayruth -- that's part of the subject of his
 23 lawsuit, correct?

24 A Correct.

25 Q Okay. Do you know the status of when that

Page 144

1 Q Do you remember that you provided a statement
 2 in connection with that investigation?
 3 A I believe I did, yes.
 4 Q Okay. Did you review any of the
 5 documentations pertaining to Mr. Komanjo Cayruth's
 6 allegations against you to prepare for your deposition
 7 today?

8 A No.

9 Q Okay. Okay. How about -- let's look at the
 10 next lawsuit, Rutherford v. City of Mount Vernon. Are
 11 you familiar with the lawsuit that Mr. Rutherford and
 12 Mr. Gallman have filed against you, among other
 13 officers?

14 A Rutherford?

15 Q And Gallman.

16 A Yes.

17 Q Okay. And you know that lawsuit also involves
 18 allegations of an -- unlawful strip searches, correct?

19 A Yes.

20 Q Okay. How about the next one? Williamson v.
 21 City of Mount Vernon. And this is 15-CV-5635. And I
 22 think it's Terrell Williamson.

23 MR. BUSHNELL: Tremel. T-R-E-M-E-L.

24 THE WITNESS: Thank you. Tremel Williamson.
 25 Thanks, Steve.

Page 143

1 case is going to trial?

2 MR. BUSHNELL: Objection. You can answer, if
 3 you know.

4 A I do not.

5 Q Okay. Do you -- does it refresh your
 6 recollection if I say this strip search was alleged to
 7 occurred at the station and been videotaped? Does that
 8 refresh your recollection in any way?

9 A No.

10 MS. DONNELL: Okay. Okay. I'm going to --
 11 Steve, what I'm going to do is I'm going to leave
 12 the questions here and then -- well, let me see.
 13 Yeah, let's do this.

14 BY MS. DONNELL:

15 Q Okay. Do you remember that you were -- this --
 16 - Mr. Komanjo Cayruth filed a civilian complaint against
 17 you related to the strip search?

18 A Do I remember if he filed a came against me?

19 Q Correct.

20 A I believe --

21 Q Correct. Not a federal complaint. I mean a
 22 complaint with the Mount Vernon Police Department?

23 A Yes. Civilian complaint?

24 Q Yep.

25 A Yes.

Page 145

1 MR. BUSHNELL: Yep.

2 BY MS. DONNELL:

3 Q Are you familiar with this lawsuit Mr. Tremel
 4 Williamson has filed against you?

5 A Yes.

6 Q Okay. And are you familiar with the
 7 allegations that he has alleged against you?

8 A Yes.

9 Q And what were those?

10 A Search.

11 Q Okay. An unlawful search?

12 A Unlawful search.

13 Q Okay. how about number four, Collier v. City
 14 of Mount Vernon? 19-CV-5230. Are you familiar with the
 15 lawsuit against you and Officers Puff and King by Mr.
 16 Collier?

17 A No.

18 Q Okay. I'll represent to you that it has
 19 allegations of false arrest allegations. How about this
 20 -- I think it's Jonathan Long v. City of Mount Vernon,
 21 18-CV-9068. Are you familiar with this lawsuit against
 22 you?

23 A No.

24 Q And I'll represent to you that this involves
 25 an allegation of an unlawful strip search from June

<p style="text-align: right;">Page 146</p> <p>1 2018. Does that refresh your recollection?</p> <p>2 A No.</p> <p>3 Q Do you, as you sit here today, have any memory</p> <p>4 of searching -- strip-searching Jonathan Long?</p> <p>5 A When?</p> <p>6 Q In 2018 -- June of 2018?</p> <p>7 A No.</p> <p>8 Q Do you know who Jonathan Long is?</p> <p>9 A Yes.</p> <p>10 Q Who is Jonathan Long?</p> <p>11 A Jonathan Long.</p> <p>12 Q Have you arrested him on more occasions before</p> <p>13 June 2018?</p> <p>14 A Once or twice.</p> <p>15 Q How many times have you strip-searched</p> <p>16 Jonathan Long?</p> <p>17 A Probably, once or twice.</p> <p>18 Q Have you obtained any weapons or contraband in</p> <p>19 your strip searches of Mr. Long?</p> <p>20 A I don't recall.</p> <p>21 Q How about for Mr. Komanjo Cayruth? You said</p> <p>22 you don't recall strip searching him at all?</p> <p>23 A I don't remember the particulars of the</p> <p>24 incident.</p> <p>25 Q Do you remember anything about it at all?</p>	<p style="text-align: right;">Page 148</p> <p>1 that information? Orally or by text?</p> <p>2 MR. BUSHNELL: Objection.</p> <p>3 Q How did you get the information from the CI?</p> <p>4 A Phone call.</p> <p>5 Q And what happened next?</p> <p>6 A I proceeded to act on that information that I</p> <p>7 received.</p> <p>8 Q What did you do?</p> <p>9 A I went to the location where Mr. Komanjo was</p> <p>10 located, detained him for further investigation, drove</p> <p>11 back to Mount Vernon headquarters, to the narcotics</p> <p>12 office, specifically. And he was found not to be in</p> <p>13 possession of any narcotics. He was released from that</p> <p>14 location without any incident. And I believe that --</p> <p>15 that incident was documented.</p> <p>16 Q And you believe that it was videotaped?</p> <p>17 A Can't recall.</p> <p>18 Q Okay. What was the basis of probable cause to</p> <p>19 arrest Mr. Cayruth?</p> <p>20 A He was not arrested. He was detained.</p> <p>21 Q What was the basis to detain Mr. Cayruth?</p> <p>22 A The confidential informant's information?</p> <p>23 Q Anything else, other than the confidential</p> <p>24 informant's information?</p> <p>25 A No.</p>
<p style="text-align: right;">Page 147</p> <p>1 MR. BUSHNELL: She's asking if you remember.</p> <p>2 BY MS. DONNELL:</p> <p>3 A The particulars of that incident?</p> <p>4 Q Correct.</p> <p>5 A Okay. I received information from a</p> <p>6 confidential source that Mr. Komanjo was in possess of</p> <p>7 contraband.</p> <p>8 Q What kind of contraband? Did the confidential</p> <p>9 informant tell you what kind of contraband?</p> <p>10 A Crack cocaine.</p> <p>(CONFIDENTIAL PORTION I REDACTED)</p> <p>12 Q Okay. We can go back on -- make the rest of</p> <p>13 this public. So you received information from a</p> <p>14 confidential informant that Mr. Komanjo Cayruth was in</p> <p>15 possession of crack cocaine; is that right?</p> <p>16 A That is right.</p> <p>17 Q And without disclosing the identity of the</p> <p>18 confidential informant, had you worked with that</p> <p>19 confidential informant in the past?</p> <p>20 A Multiple times.</p> <p>21 Q For what period of time, prior to the arrest</p> <p>22 of Komanjo Cayruth?</p> <p>23 MR. BUSHNELL: Objection. You can answer.</p> <p>24 Q I want to say, probably a year. Maybe two.</p> <p>25 A Okay. Okay. After -- how did you receive</p>	<p style="text-align: right;">Page 149</p> <p>1 Q So based solely on the phone call from the</p> <p>2 confidential informant, you detained Mr. Cayruth,</p> <p>3 brought him into police custody, conducted a strip</p> <p>4 search of him, found no drugs or other contraband on</p> <p>5 this person, and then you released him?</p> <p>6 MR. BUSHNELL: Objection. You can answer.</p> <p>7 A Correct.</p> <p>8 Q Prior to your search of Mr. Cayruth on</p> <p>9 November 5, 2015, had you had any interactions with</p> <p>10 Mr. Cayruth?</p> <p>11 A I believe I had, maybe in -- not directly,</p> <p>12 possibly indirectly to somebody else -- to possibly a</p> <p>13 coworker.</p> <p>14 Q Who? What coworker?</p> <p>15 A I don't recall, but I -- he was, he was not a</p> <p>16 -- somebody that we weren't familiar with. We were</p> <p>17 familiar with Komanjo. Specifically, in the location</p> <p>18 where he was detained.</p> <p>19 Q When you're saying, "We" -- but I'm saying,</p> <p>20 did you personally have any interactions -- arrests or</p> <p>21 interactions with Komanjo Cayruth prior to November 5,</p> <p>22 2015?</p> <p>23 A I might have, or I might have not. I --</p> <p>24 Q You don't know either way?</p> <p>25 A Correct.</p>

<p style="text-align: right;">Page 150</p> <p>1 Q You don't recall?</p> <p>2 A I don't recall.</p> <p>3 MR. BUSHNELL: So Camilo, if you don't recall,</p> <p>4 just tell her you don't recall. All right.</p> <p>5 THE WITNESS: All right.</p> <p>6 MR. BUSHNELL: And that's all.</p> <p>7 BY MS. DONNELL:</p> <p>8 Q Did you tell Mr. Cayruth why he was being</p> <p>9 detained?</p> <p>10 A I don't recall. No.</p> <p>11 Q Was Mr. Cayruth free to go?</p> <p>12 A Yes.</p> <p>13 Q Did -- could he have opted out of the strip</p> <p>14 search? He could have said, no, I don't want to be</p> <p>15 strip-searched?</p> <p>16 MR. BUSHNELL: Objection. You can answer.</p> <p>17 A I'm sorry. What -- I didn't -- your last</p> <p>18 question, was he free to go prior to --</p> <p>19 Q I'm saying prior -- you're saying he wasn't</p> <p>20 arrested, but he wasn't free to go and he was</p> <p>21 strip-searched. So I'm a little confused. Wasn't he</p> <p>22 under your arrest --</p> <p>23 A He was detained --</p> <p>24 Q -- at the time he was stopped and</p> <p>25 strip-searched?</p>	<p style="text-align: right;">Page 152</p> <p>1 MS. DONNELL: Steve, can I just ask you a</p> <p>2 question? If I want to show him documents from the</p> <p>3 civilian investigation for the internal</p> <p>4 investigation, do you want me to put it under</p> <p>5 confidential?</p> <p>6 MR. BUSHNELL: Yeah. I would appreciate that.</p> <p>7 Thank you.</p> <p>8 (CONFIDENTIAL PORTION II REDACTED)</p> <p>9 Q Okay. Let's see. Mr. Tremel Williamson -- do</p> <p>10 you know who Tremel Williamson is?</p> <p>11 A Tremel Williamson?</p> <p>12 Q Tremel Williamson? Yeah.</p> <p>13 A Vaguely. Yes.</p> <p>14 Q Who is he? What -- who -- what's your</p> <p>15 understanding of Tremel Williamson?</p> <p>16 A Individual that was arrested, I believe, on</p> <p>17 this date.</p> <p>18 Q On what date?</p> <p>19 A Can't remember the date, but obviously he has</p> <p>20 a lawsuit against me here, yeah?</p> <p>21 Q Do you have any memory of conducting a strip</p> <p>22 search of Mr. Tremel Williamson on January 20, 2015?</p> <p>23 A Absolutely not.</p> <p>24 MR. BUSHNELL: Well, can I clarify that? He</p> <p>25 has no memory of it or did he conduct the search</p>
<p style="text-align: right;">Page 151</p> <p>1 A Correct. So he was detained to further the</p> <p>2 investigation.</p> <p>3 Q All right. Did you have probable cause to</p> <p>4 arrest him at the time that he was detained?</p> <p>5 A I had probable cause to detain him to get the</p> <p>6 information received, to see if it was active.</p> <p>7 Q What was the basis for your justification to</p> <p>8 conduct a strip search of Mr. Cayruth?</p> <p>9 MR. BUSHNELL: Objection. You can answer.</p> <p>10 A Information from the informant.</p> <p>11 Q Had you done anything to independently verify</p> <p>12 the confidential informant's information they gave you?</p> <p>13 A Can you repeat the question to me?</p> <p>14 Q Did you independently do anything -- did you</p> <p>15 do anything, take any steps, to verify the information</p> <p>16 that the confidential informant provided you before you</p> <p>17 arrested Mr. Cayruth and then brought him in for a strip</p> <p>18 search?</p> <p>19 A Identify him at the location of where the</p> <p>20 incident was taking place.</p> <p>21 Q And what location was that?</p> <p>22 A I believe it was East Prospect Avenue.</p> <p>23 Q Okay. Was that search videotaped?</p> <p>24 A I don't remember.</p> <p>25 Q Okay.</p>	<p style="text-align: right;">Page 153</p> <p>1 with him?</p> <p>2 BY MS. DONNELL:</p> <p>3 Q Do you have -- do you have -- well, let's</p> <p>4 clarify. Were you pre -- were you present for the</p> <p>5 arrest of Mr. Williamson?</p> <p>6 A For the search warrant in his apartment? Yes.</p> <p>7 Q Were you present for the strip search of him?</p> <p>8 A I was not.</p> <p>9 Q Okay. And who -- do you know who was?</p> <p>10 A I don't remember. No.</p> <p>11 Q Okay. Do you know who Officer Campo is?</p> <p>12 A Officer Campo?</p> <p>13 Q Yes.</p> <p>14 A Yes.</p> <p>15 Q Who's that? Was that one of the narcotics</p> <p>16 officers with you in 2015?</p> <p>17 A He was a part of the unit in 2015. Yes.</p> <p>18 Q Okay. Do you have any information or</p> <p>19 knowledge about Officer Campo's search of Tremel</p> <p>20 Williamson?</p> <p>21 A I do not.</p> <p>22 Q Okay. How about Tyrone Govan? Do you know</p> <p>23 who that is?</p> <p>24 A Yes.</p> <p>25 Q Who's Tyrone Govan?</p>

<p style="text-align: right;">Page 154</p> <p>1 A Tyrone Govan.</p> <p>2 Q Yeah. How do you know him?</p> <p>3 A How do I know Tyrone Govan?</p> <p>4 Q Yes.</p> <p>5 A Because I -- I arrested him once in 2012. No</p> <p>6 --</p> <p>7 Q In 2012?</p> <p>8 A In 2012. Yes.</p> <p>9 Q Okay. Did you use excessive force when you</p> <p>10 arrested him in 2012?</p> <p>11 MR. BUSHNELL: Objection. You can answer.</p> <p>12 A No.</p> <p>13 Q You deny using any excessive force when you</p> <p>14 arrested Mr. Govan?</p> <p>15 A No.</p> <p>16 MR. BUSHNELL: Yeah -- no, as in you deny it?</p> <p>17 Or no --</p> <p>18 A No. I didn't use excessive --</p> <p>19 Q I'm sorry. I can clarify. Did you use</p> <p>20 excessive force when you arrested Mr. Govan?</p> <p>21 A No. I did not.</p> <p>22 Q Okay. Giles v. City of Mount Vernon. Do you</p> <p>23 know of this case?</p> <p>24 A What's the name?</p> <p>25 Q Just a second --</p>	<p style="text-align: right;">Page 156</p> <p>1 A Yes.</p> <p>2 Q Okay. How about the lawsuit against -- by</p> <p>3 Mr. King filed against you? Are you familiar with Kevin</p> <p>4 King?</p> <p>5 A I don't even know who this guy is.</p> <p>6 Q You don't know who that is. Okay. Okay. How</p> <p>7 about Henderson Clark? Do you know Henderson Clark?</p> <p>8 A Yes.</p> <p>9 Q How do you know Henderson Clark?</p> <p>10 A Henderson Clark was part of a -- an undercover</p> <p>11 operation, in which we utilized undercover officers to</p> <p>12 buy narcotics from him. Subsequently he was arrested</p> <p>13 and --</p> <p>14 Q Did you conduct a strip search of Mr. Clark?</p> <p>15 MR. BUSHNELL: Objection. You can answer.</p> <p>16 A I don't remember.</p> <p>17 Q Okay. Have you ever been disciplined for any</p> <p>18 of your conduct with the Mount Vernon Police Department?</p> <p>19 Have you ever had any kind of discipline imposed on you?</p> <p>20 A One.</p> <p>21 Q What was that?</p> <p>22 A I forgot to mention my shield number, while</p> <p>23 answering a phone call. So I received a written</p> <p>24 reprimand. Other than that, I've never received any</p> <p>25 discipline.</p>
<p style="text-align: right;">Page 155</p> <p>1 MR. BUSHNELL: It's Michael</p> <p>2 MS. DONNELL: Michael. Sorry. Thank you.</p> <p>3 MR. BUSHNELL: Okay. And, and I'll just --</p> <p>4 I'll just, you know, note that this is an ongoing</p> <p>5 case, but you can ask.</p> <p>6 BY MS. DONNELL:</p> <p>7 Q Do you know Michael Giles?</p> <p>8 A In that -- no. I do not. I just happened to</p> <p>9 meet him the day of this incident.</p> <p>10 Q Okay. Do you remember the day you met him?</p> <p>11 A Specifically? No.</p> <p>12 Q But you know who we're talking about?</p> <p>13 A Yes.</p> <p>14 Q Okay. Are you familiar with the allegations</p> <p>15 that Mr. Giles -- or Giles -- or Giles has lodged</p> <p>16 against you?</p> <p>17 A And what are those allegations?</p> <p>18 Q I'm asking you if you're (inaudible)?</p> <p>19 A No. I do not.</p> <p>20 Q The allegations pertained to an incident on</p> <p>21 July 19, 2018 at the Volunteers of America homeless</p> <p>22 shelter. Does that refresh your recollection?</p> <p>23 A Yes.</p> <p>24 Q And are you familiar with the lawsuit against</p> <p>25 you by Mr. Giles?</p>	<p style="text-align: right;">Page 157</p> <p>1 Q Do you recall when you received that written</p> <p>2 reprimand, or what it was pertaining to?</p> <p>3 A This was, I believe early 2012, right before I</p> <p>4 came off modified duty. So while I was modified, I was</p> <p>5 sitting in the front -- the front desk of the police</p> <p>6 headquarters. And it was -- I believe it was a busy</p> <p>7 day, so the phones were going crazy. So I stepped into</p> <p>8 the radio room to help out with the phone calls coming</p> <p>9 in. And as I answered the phone, I forgot to mention my</p> <p>10 shield number. And because of that, I got a written</p> <p>11 reprimand.</p> <p>12 Q Did this pertain to the -- your interactions</p> <p>13 with, I think it's Helena Edwards, Judge Edwards wife?</p> <p>14 A Yes. That's the one. Yes.</p> <p>15 Q Okay. And so to your knowledge, that's the</p> <p>16 only discipline you received, was when you were on</p> <p>17 modified duty, your interactions with Judge Edwards</p> <p>18 wife?</p> <p>19 A That is the only discipline I've received in</p> <p>20 my whole entire police career.</p> <p>21 Q Okay. And your understanding was the</p> <p>22 reprimand was just because you didn't give your badge</p> <p>23 number; is that right?</p> <p>24 A That is, I believe, the section that was</p> <p>25 written under the written reprimand that I signed.</p>

Page 158

1 Q Do you have knowledge of the allegations that
 2 Ms. Edwards made against you?
 3 A The allegations that -- so if I recall this
 4 correctly, is that the -- the whole entire incident was
 5 based on somebody else answering the phone. And when I
 6 answered the phone, I didn't state my shield number.
 7 Because the person that previously answered the phone
 8 wasn't very cordial towards Mrs. Edwards. So when I
 9 went into the radio room to help out, I answered a phone
 10 call that, you know, she had called. And when I -- when
 11 I answered, I didn't say my shield number. So my
 12 understanding is that when they went back to listen to
 13 the whole entire conversation, they -- they heard me not
 14 say my shield number. And that's why -- I got written
 15 up for.

16 Q Okay. In the -- all the citizen -- do you
 17 know how many total citizen complaints have been filed
 18 against you in your work as a Mount Vernon police
 19 officer?

20 A No. I do not.

21 Q Is there any documentation that you have as an
 22 employee that would inform you how many complaints have
 23 been made against you?

24 A I'm sure there's a di -- disciplinary file
 25 that's kept within the Mount Vernon Police Department of

Page 159

1 my personal records. But as far as the number of how
 2 many civilian complaints I received, no, I don't.
 3 Specifically, no. I do not.

4 Q And do you think that the complaints are kept
 5 in your personal file or a disciplinary file?

6 A I --

7 MR. BUSHNELL: Objection. You can answer.

8 A I believe it's a disciplinary file.

9 Q Okay. Have you ever seen it?

10 A I -- I requested to see it about a year ago.

11 Q Why did you request to see it a year ago?

12 A Because I was curious to see what was in that
 13 file.

14 Q Did they show it to you?

15 A Yes. I saw what was in the file.

16 Q Where did you look at it? Did you get to take
 17 it home with you or did you have to look at the station?

18 A No. In the police station.

19 Q And why -- why were you curious to see what
 20 was in your file?

21 MR. BUSHNELL: Objection. You can answer.

22 A When you get all these -- you know, weird
 23 civilian complaints, you kind of want to see -- you
 24 know, I was just curious.

25 Q And were you able to read the civilian

Page 160

1 complaints that were in your file at that time?

2 A No. No.

3 Q Why not?

4 A I wasn't so much interested in reading all the
 5 specifics of the civilian complaints.

6 Q What office did you go to, to get the file?

7 MR. BUSHNELL: Objection. You can answer.

8 A The office of personnel.

9 Q So it was in the personnel department?

10 A Yes.

11 Q Okay. Do you remember whose office your file
 12 -- disciplinary file was in?

13 MR. BUSHNELL: Objection. You can answer.

14 A Personnel file -- personnel office.

15 Q But which employee gave you the file -- that
 16 got the file and give it to you?

17 MR. BUSHNELL: Objection. You can answer.

18 A Lieutenant Gregory Addison.

19 Q Okay. So you went in one day and said, hey,
 20 can I look at my disciplinary file? And Lieutenant
 21 Gregory Addison gave it to you and said, yeah, you can
 22 read it. Here it is?

23 A No. You have to put in a request.

24 Q What kind of request? Like a written request?

25 A You have to put in a written request to see

Page 161

1 your disciplinary -- whole personnel files, which
 2 everything is all in -- I believe they give you
 3 everything. And you are allowed to review it in front
 4 of -- which that's how I did it, in front of Lieutenant
 5 Addison.

6 (CONFIDENTIAL PORTION III REDACTED)

7 VIDEOGRAPHER: Yeah. Absolutely. We are going
 8 off the record at 2:25 p.m.

9 (OFF THE RECORD)

10 VIDEOGRAPHER: We are back on the record at
 11 2:34 p.m.

12 BY MS. DONNELL:

13 Q Okay. All right. Detective Antonini, I'm
 14 going to ask you about the incident subject to
 15 Mr. Seward's lawsuit from November 7, 2017. Okay?

16 A Okay.

17 Q Earlier today you testified that you do not
 18 have independent recollection of any of the events,
 19 other than those you reviewed in the police report or in
 20 the video, is that still true?

21 A Yes.

22 Q Okay. Do you have a memory, other than what
 23 you observed and listened to in the video recording, of
 24 conducting a search warrant of 156 South First Avenue on
 25 November 7, 2017?

Page 162

1 A Yes. I have no recollection of that incident.
 2 Q Okay. Do you have a recollection of anything
 3 you did during your shift that you worked on
 4 November 7, 2017? Do you know any other arrests you did
 5 -- any other search warrants you effected?

6 A No.

7 Q Okay. Did you have any interactions with my
 8 client Alan Seward prior to your encounter with him on
 9 November 7, 2017?

10 MR. BUSHNELL: Objection. You can answer.

11 A I don't remember.

12 Q So your testimony is you don't remember having
 13 any interactions with Alan Seward, prior to your
 14 interactions on November 7, 2017; is that right?

15 MR. BUSHNELL: Objection. You can answer.

16 A Correct.

17 Q Okay. So for example, you don't ever remember
 18 stopping him prior to November 7, 2017?

19 A Correct.

20 Q You don't have any prior arrests that you
 21 recall of Mr. Seward prior to November 7, 2017?

22 MR. BUSHNELL: Objection. Go ahead.

23 A I don't remember. No.

24 Q Okay. Had you ever conducted any searches of
 25 Mr. Seward prior to November 7, 2017?

Page 163

1 MR. BUSHNELL: Objection. Go ahead.

2 A No. I don't remember.

3 Q I think I asked you this, but do you know how
 4 many calls, or investigations, or arrests, or search
 5 warrants you did prior to your interactions with
 6 Mr. Seward on your shift on November 7, 2017?

7 A No.

8 Q So do you, as you sit here today, have a
 9 memory of going out to 156 South First Avenue on
 10 November 7th?

11 A No. I don't.

12 Q You have no independent memory?

13 A No. I don't.

14 Q Okay. Having read the reports that you
 15 reviewed and looking at the video you looked at prior to
 16 your deposition, do you now know that you went out to
 17 156 South First Avenue on November 7, 2017?

18 A Yes.

19 Q Okay.

20 A Yes.

21 Q Do you know what officers were with you from
 22 the narcotics unit at the initial search of 156 South
 23 First Avenue?

24 A I remember a few of the officers that were
 25 there.

Page 164

1 Q Who do you remember being there?

2 A Bobby Puff, Joseph Valente, Patrick King,
 3 Sergeant Fegan, I believe Lieutenant Quinoy -- or
 4 Sergeant Quinoy at the time. That's to the extent. Yes.

5 Q And all of the individuals you just listed,
 6 those are members of the narcotics unit back in November
 7 2017?

8 A No.

9 Q Oh, some of them were police officers; is that
 10 right? Patrol?

11 A Sergeant Quinoy -- or Lieutenant Quinoy at the
 12 time, he was not part of the narcotics unit.

13 Q What division was he part of?

14 A Patrol division.

15 Q Do you know -- do you have an understanding
 16 why Sergeant Quinoy was present?

17 A No.

18 Q Was there -- you know I should -- didn't ask
 19 you this earlier, but when you started on your shift
 20 with the narcotics unit, would there usually be a
 21 briefing at the beginning of each shift?

22 A No.

23 Q Would you all meet at the department, and then
 24 go out, and do various assignments?

25 A We all showed up at the time we're supposed to

Page 165

1 show up for work and then everybody goes about their
 2 daily routine.

3 Q How would you decide what you would go about?
 4 Would you be given assignments from the sergeant in
 5 charge?

6 A It could be that you have some, you know,
 7 ongoing investigation into, you know, certain cases that
 8 you have to look up or follow up with. You know,
 9 everybody had their own cases or investigations going on
 10 at the time.

11 Q Do you remember what cases or investigations
 12 you had going on in November 2017?

13 A No.

14 Q Was the search warrant that was executed on
 15 November 7, 2017, was that part of your case or is that
 16 one of your fellow officer's cases?

17 A It was not my case, no.

18 Q Okay. Was it Bobby Puff's case?

19 A I believe so.

20 Q Okay. Why do you believe so?

21 A Because I think it was his name on the
 22 application for the search warrant. Okay.

23 COURT REPORTER: Mr. Seward is in the waiting
 24 room.

25 MS. DONNELL: Okay. Let's see if we can let

Page 166

1 him in, we don't have to go off the record, just see
 2 if we can get him in. Thanks. Hi, Mr. Seward. I
 3 will let the record reflect that the plaintiff Alan
 4 Seward is now present on the Zoom. Mr. Seward, I'm
 5 going to make sure you can hear us. Can you let us
 6 know you can hear us?

7 COURT REPORTER: It says he's still connecting
 8 to the audio, so he can't hear you.

9 MS. DONNELL: Okay. Since this looks like it
 10 might take a minute, let's go off the record.
 11 Sorry, maybe we hear -- Mr. Seward, can you hear us
 12 now? Okay. Let's go off the record then.

13 VIDEOGRAPHER: All right. We are off the
 14 record at 2:42 p.m.

15 (OFF THE RECORD)

16 VIDEOGRAPHER: All right, we're back on the
 17 record at 2:46 p.m.

18 BY MS. DONNELL:

19 Q Okay. Oh, okay, so I think I was asking you
 20 questions pertaining this case. And you said that it
 21 was your understanding that this was Bobby Puff's case
 22 because he had sworn the affidavit for the search
 23 warrant, is that your testimony?

24 A Yes.

25 Q Okay. Do you have any information -- or did

Page 167

1 you have any conversations with Officer Puff about the
 2 information he had obtained to get the search warrant?

3 A No.

4 Q Before you went out to execute the search
 5 warrant at 156 South First Avenue on November 7, 2017,
 6 had there been a briefing on the search warrant?

7 A Prior to executing the search warrant?

8 Q Yes.

9 A Yes. I don't recall, but yes. Always -- we
 10 always have a meeting prior to executing.

11 Q So is it your testimony that you do not have
 12 an actual memory of the briefing prior to executing this
 13 search warrant, but you know that prior to executing any
 14 search warrant there would be a briefing before
 15 executing it?

16 A Yes.

17 Q Okay. But as you sit here today, you have no
 18 memory of any of the information that was provided at a
 19 briefing, if it occurred, prior to going to 156 South
 20 First Avenue on November 7, 2017; is that correct?

21 A Yes.

22 Q I'm sorry, what did you --

23 A Correct. Yes.

24 Q Thank you. Okay. Do you, as you sit here
 25 today, know the confidential informant that Officer Puff

Page 168

1 relied on to make the affidavit for his search warrant?

2 MR. BUSHNELL: Objection.

3 A No. I do not.

4 Q Do you recall what you were wearing on
 5 November 7, 2017 when you were on duty?

6 A No. I do not.

7 Q Okay. Do you have a memory of what time the
 8 search warrant was conducted?

9 A No. I do not.

10 Q Do you have an independent memory of any
 11 narcotics being obtained from the apartment that you
 12 searched?

13 A I don't recall.

14 Q Did you -- so earlier today you said you were
 15 the one operating the video recording that you viewed;
 16 is that right?

17 A Yes.

18 Q Was that -- did you -- how was it determined
 19 on any particular day, who was going to operate the
 20 video camera? Is that something you typically did, or
 21 you guys shared responsibilities?

22 A Shared responsibilities.

23 Q So sometimes it was you, sometimes it was
 24 another officer?

25 A Correct.

Page 169

1 Q And was there any particular reason, like
 2 would Sergeant Fegan say, you do the video today?
 3 Somebody else -- was he one that determined who did the
 4 video or some other method?

5 A I want to say because I was in the apartment
 6 at the time with Sergeant Fegan and nobody else was
 7 there.

8 Q Okay. So when you were operating the video,
 9 it was only you and Sergeant Fegan present in the
 10 apartment?

11 A I don't recall specifically who was there at
 12 the time, but he was there, and I was there.

13 Q Okay. Did you go to the Bungalow Bar at some
 14 point after going to 156 First Avenue?

15 A No. I did not.

16 Q It's your testimony that you never left the
 17 apartment on November 7, 2017 -- I mean -- sorry, let me
 18 start that again. Is it your testimony that you never
 19 went to the Bungalow Bar on November 7, 2017?

20 A That is correct.

21 Q Okay. Do you have knowledge about who went to
 22 the Bungalow Bar?

23 A Sergeant Quinoy at the time. I know Puff
 24 went. Anybody else from there, I can't -- don't recall.

25 Q How do you know Sergeant Quinoy and Officer

Page 170

1 Puff went to the Bungalow Bar?

2 A Because a supervisor had to stay in the
 3 apartment at the time and it was Sergeant Fegan with me
 4 in the apartment.

5 Q Okay. Did you take any photographs inside the
 6 apartment or did you just video tape?

7 A I don't recall taking photographs. No.

8 Q Tell me everything you recall doing in the
 9 apartment?

10 A Video recording.

11 Q What did you video record?

12 A The apartment.

13 Q Why were you recording?

14 A To show the apartment pre-search and I believe
 15 post-search.

16 Q So it's your testimony that you video recorded
 17 the apartment before it was searched and after it was
 18 searched?

19 MR. BUSHNELL: Objection. Go ahead.

20 A Yes.

21 Q Do you have an independent recollection of
 22 children being present at the apartment?

23 A I don't remember who was inside the apartment
 24 at the time. No.

25 Q Do you recall how many officers first went to

Page 171

1 the apartment, other than yourself and Sergeant Fegan?

2 A No.

3 Q Do you remember any evidence that was found at
 4 the apartment?

5 A No.

6 Q So you have no recollection of any of the
 7 evidence that was obtained pursuant to the search
 8 warrant, is that your testimony?

9 A Yes.

10 Q How long were you present at 156 South First
 11 Avenue?

12 A I don't remember how long we were in the
 13 apartment for. No.

14 Q Were you present in the apartment when
 15 Mr. Seward was brought to the apartment?

16 A I don't remember that. No.

17 Q You have no memory of the plaintiff Alan
 18 Seward being brought to 150 -- I'm sorry, 156 South
 19 First Avenue?

20 A That is correct.

21 Q Okay. Were you and Sergeant Fegan -- well,
 22 just let me step back. Just generally, how did
 23 narcotics officers communicate with one another when you
 24 were on duty? Did you use your cellphones, radio,
 25 anything else?

Page 172

1 A How we communicate with each other when we
 2 were facing each other?

3 Q When you're on duty -- no, I'm sorry. Could
 4 you communicate with each other when you were in
 5 separate cars? Would you call each other on your
 6 cellphones? Or how did you communicate with each other
 7 when you weren't face-to-face?

8 A We use our cellphones.

9 Q Were they department-issued cellphones?

10 A No. Our regular cellphone.

11 Q Like your personal cellphone?

12 A Yes.

13 Q What was your cellphone number that you used
 14 in November 2017?

15 MR. BUSHNELL: Objection.

16 Q Is it the same number you use now?

17 A That I used on November '17 to do what?

18 Q You said you communicated with other narcotics
 19 officers on your cellphones, correct?

20 MR. BUSHNELL: Objection. Can I provide that
 21 to you without Plaintiff being on -- putting that on
 22 the record?

23 MS. DONNELL: Sure. Yeah, we can get that in
 24 just a minute.

25 BY MS. DONNELL:

Page 173

1 Q But I want to know -- let me just ask you
 2 this. Did you, Detective Antonini, when you were on
 3 duty and you wanted to communicate with one of the other
 4 narcotics officers who wasn't in the car with you, let's
 5 say you're driving to execute a search warrant, would
 6 you talk to each other on your cellphones?

7 A We have a department issue at the time, Direct
 8 Connect cellphone.

9 Q Okay.

10 A Okay. So if that cellphone was not working at
 11 the time, we resort to using our own personal phones
 12 just to call each other.

13 Q Okay.

14 A Very rarely we use our department radio, in
 15 order to avoid, you know, everybody else in the
 16 department to hear what we were talking about.

17 Q So it sounds like as a narcotics officer, if
 18 you wanted to communicate with your other fellow
 19 officers who weren't physically present with you, you
 20 would have a Direct Connect cellphone that was issued by
 21 the department as one option?

22 A Correct.

23 Q And if that equipment wasn't working for
 24 whatever reason, you had each other's personal cellphone
 25 numbers and you could call and talk to each other?

<p style="text-align: right;">Page 174</p> <p>1 A Correct.</p> <p>2 Q And you could also text one another on your</p> <p>3 personal cellphones?</p> <p>4 A Yes.</p> <p>5 Q Could you text each other on the Direct</p> <p>6 Connect cellphones?</p> <p>7 A Can we text --</p> <p>8 Q Could you -- do you text on the Direct Connect</p> <p>9 cellphones?</p> <p>10 A Yes, you could text.</p> <p>11 Q Okay. Did the Direct Connect cellphones work</p> <p>12 very well? Were they frequently operational?</p> <p>13 A I don't recall. It's hard to say. Sometimes</p> <p>14 the weather would make them go crazy, sometimes they</p> <p>15 were working. Depending on the signal -- the strength</p> <p>16 of the signal, if it worked.</p> <p>17 Q Is it fair to say that you more frequently</p> <p>18 just ended up using your cellphones because it worked</p> <p>19 more reliably?</p> <p>20 MR. BUSHNELL: Objection. Go ahead.</p> <p>21 A Yes and no.</p> <p>22 Q Do you know if on this date, November 7, 2017,</p> <p>23 you were using the Direct Connect cellphone or your</p> <p>24 personal cellphone to communicate with your fellow</p> <p>25 officers?</p>	<p style="text-align: right;">Page 176</p> <p>1 Sergeant Quinoy returning to the apartment; is that</p> <p>2 right?</p> <p>3 A That is correct.</p> <p>4 Q Okay. Do you recall learning at any point any</p> <p>5 of the -- what happened at the Bungalow Bar -- sorry,</p> <p>6 that's not a very good question. On November 7, 2017,</p> <p>7 at any point do you remember receiving information from</p> <p>8 one of your fellow officers about what they said</p> <p>9 transpired at the Bungalow Bar?</p> <p>10 A No.</p> <p>11 Q Do you, as you sit here today, have any memory</p> <p>12 of interacting with my client Alan Seward on</p> <p>13 November 7, 2017 in any capacity?</p> <p>14 A No.</p> <p>15 Q Did you talk to him at the police station</p> <p>16 after he was arrested?</p> <p>17 A No.</p> <p>18 Q Did you -- were you present for a strip search</p> <p>19 of Mr. Seward at 156 South First Avenue?</p> <p>20 A No.</p> <p>21 Q Were you present for a strip search of</p> <p>22 Mr. Alan at the station?</p> <p>23 A I don't recall anymore.</p> <p>24 Q I'm sorry, Mr. Seward. I said Mr. Alan. I</p> <p>25 apologize, Mr. Seward. Were you present for</p>
<p style="text-align: right;">Page 175</p> <p>1 A On that specific day?</p> <p>2 Q Correct.</p> <p>3 A No. I don't remember -- I don't remember how</p> <p>4 we communicated that day.</p> <p>5 Q Okay. The cellphone number that you have</p> <p>6 today, your personal cellphone number, was that the same</p> <p>7 number that you had back on November 7, 2017?</p> <p>8 A Yes.</p> <p>9 MS. DONNELL: Okay. Steve, I'll ask you for</p> <p>10 that, but I won't do it right now on the record,</p> <p>11 okay?</p> <p>12 MR. BUSHNELL: Yeah. Anything in writing.</p> <p>13 Thanks.</p> <p>14 BY MS. DONNELL:</p> <p>15 Q Okay. All right. So do you recall whether</p> <p>16 you and Sergeant Fegan were in communication with</p> <p>17 Sergeant Quinoy and Officer Puff, while they were at the</p> <p>18 Bungalow Bar?</p> <p>19 A I don't recall. No.</p> <p>20 Q Okay. So you don't recall whether or not you</p> <p>21 were receiving information from them about what was</p> <p>22 going on at the Bungalow Bar; is that correct?</p> <p>23 A That is correct.</p> <p>24 Q Okay. And you have no memory one way or the</p> <p>25 other, as you sit here today, about Officer Puff and</p>	<p style="text-align: right;">Page 177</p> <p>1 Mr. Seward's arrest at the Bungalow Bar?</p> <p>2 A No.</p> <p>3 Q Did you -- do you deny strip searching</p> <p>4 Mr. Seward at the Bungalow Bar?</p> <p>5 A I was never at the Bungalow Bar.</p> <p>6 Q Never at the Bungalow. Okay. Did you, at any</p> <p>7 point on November 7, 2017, strike Mr. Seward in the</p> <p>8 face?</p> <p>9 A Absolutely not. No.</p> <p>10 Q Okay. Did you ever have a conversation with</p> <p>11 Mr. Seward, in which you asked him to become a</p> <p>12 confidential informant for you?</p> <p>13 A No.</p> <p>14 Q You deny that happened?</p> <p>15 A Can you repeat that?</p> <p>16 Q You deny that happened?</p> <p>17 A It did not happen. No.</p> <p>18 Q Okay. So you're saying you deny that</p> <p>19 happened, correct?</p> <p>20 A It did not happen. No.</p> <p>21 Q Okay. I'm going to have you look at exhibits</p> <p>22 -- which one? Just a second. I can figure out how to</p> <p>23 play it --</p> <p>24 MR. BUSHNELL: What exhibit is it?</p> <p>25 MS. DONNELL: I'm not sure just yet. I need to</p>

<p style="text-align: right;">Page 178</p> <p>1 get my computer back up. Just a second.</p> <p>2 MR. BUSHNELL: No worries.</p> <p>3 BY MS. DONNELL:</p> <p>4 Q Let's see. Exhibit 9. Okay. Detective</p> <p>5 Antonini, do you have what I've previously designated as</p> <p>6 Exhibit 9 to your deposition?</p> <p>7 (EXHIBIT 9 MARKED FOR IDENTIFICATION)</p> <p>8 A Yes.</p> <p>9 Q And this is a two page document that's a, "New</p> <p>10 York State incident report"?</p> <p>11 A Okay.</p> <p>12 Q Is that right?</p> <p>13 A Yes.</p> <p>14 Q Is this one of the reports that you reviewed</p> <p>15 in preparation for your deposition today?</p> <p>16 A Yes.</p> <p>17 Q Okay. And let's see, do you recognize the</p> <p>18 reporting officer's signature as Officer Puff's</p> <p>19 signature down at the bottom left hand in box 78?</p> <p>20 A Yes.</p> <p>21 Q And do you recognize Sergeant Fegan's</p> <p>22 signature in box 80 as the --</p> <p>23 A Yes.</p> <p>24 Q Okay. And you'll see this is dated November</p> <p>25 7, 2017, is the date of the incident, right?</p>	<p style="text-align: right;">Page 180</p> <p>1 7, '17', 2002 is the report time. Occurrence from and</p> <p>2 to, so the whole incident happened between 1945 and</p> <p>3 8:25. So between that gap is where the incident took</p> <p>4 place.</p> <p>5 Q Got it. And for this, the incident refers to</p> <p>6 the search at 156 South First Avenue?</p> <p>7 A Yes.</p> <p>8 Q Okay. So you see here, and this is -- you</p> <p>9 understand this to be Officer Puff who filled out this</p> <p>10 incident report; is that right?</p> <p>11 A Correct.</p> <p>12 Q Okay. And Officer Puff indicated that at</p> <p>13 above date and time, "The narcotics unit along with</p> <p>14 Sergeant Quinoy, Police Officer Hutchins, Salazar and</p> <p>15 Palmer conducted a search warrant signed by the</p> <p>16 Honorable Adrian Armstrong at 156 South First Avenue,</p> <p>17 Apartment 4N," as in Nancy. Do you see that?</p> <p>18 A Yes.</p> <p>19 Q It says, "Upon making entry, we encountered</p> <p>20 four children." Does that refresh your recollection</p> <p>21 that there were four children present in the apartment</p> <p>22 4N when you went there?</p> <p>23 A No.</p> <p>24 Q There's three females in the back bedroom? Do</p> <p>25 you see that?</p>
<p style="text-align: right;">Page 179</p> <p>1 A Yes.</p> <p>2 Q And let's see, the time -- the report time is</p> <p>3 2002, right?</p> <p>4 A Yes.</p> <p>5 Q What does the report time mean to you in box</p> <p>6 nine of an incident report?</p> <p>7 A What is the what? Sorry.</p> <p>8 Q What is the report time? Is that when the</p> <p>9 report's being created?</p> <p>10 A 2002. The report time. Yes.</p> <p>11 Q Okay. And 1945 is what? The time --</p> <p>12 A When the call was made to the radio -- radio</p> <p>13 room.</p> <p>14 Q But this was a search warrant, right?</p> <p>15 A Correct.</p> <p>16 Q So there wasn't a call to the radio? Or what</p> <p>17 was that? What do you mean?</p> <p>18 A The call would have made to the radio room</p> <p>19 once the entry was made into the --</p> <p>20 Q I see. Got you. Okay. And so then there's a</p> <p>21 couple other times, there's time 12 and time 15 -- box</p> <p>22 12 and box 15. What are those times?</p> <p>23 A What?</p> <p>24 Q You see at the top after the date?</p> <p>25 A So it says -- so the report date is November</p>	<p style="text-align: right;">Page 181</p> <p>1 A Yes.</p> <p>2 Q Okay. And the females were identified as</p> <p>3 Sheila Blakey Holley, H-O-L-L-E-Y, correct?</p> <p>4 A Yes.</p> <p>5 Q Is that right? Nakia Brabham?</p> <p>6 A Brabham?</p> <p>7 Q Brabham, sorry, Brabham. Thank you. And</p> <p>8 Shania [sic] Riddenhour, right?</p> <p>9 A Shania Riddenhour.</p> <p>10 Q Shania. Okay. Do you any of those three</p> <p>11 individuals?</p> <p>12 A No.</p> <p>13 Q I'm sorry. Did you know them in November</p> <p>14 2017?</p> <p>15 A No.</p> <p>16 Q Were any of those three individuals Officer</p> <p>17 Puff's confidential informants to your knowledge?</p> <p>18 MR. BUSHNELL: Objection.</p> <p>19 A I can't -- I don't know.</p> <p>20 Q You don't know? Okay. So then it says --</p> <p>21 okay. So it says that those three females were located</p> <p>22 in the back bedroom, right?</p> <p>23 A Ask that question again. Sorry.</p> <p>24 Q I'm sorry. I was reading that -- I was</p> <p>25 repeating that "Upon making entry, we encountered four</p>

Page 182

1 children in the living room and three females, AP1, AP2,
 2 and AP3 in back bedroom," right?

3 A That's what the report says. Yes.

4 Q Okay. And you have no independent
 5 recollection of this, right?

6 A Correct.

7 Q So you have no way to confirm or deny whether
 8 what Officer Puff has put here is accurate, correct?

9 A Correct.

10 Q Okay. And then Officer Puff goes on to write,
 11 "A search of the apartment yielded one ceramic plate
 12 with cocaine residue, two razor blades with cocaine
 13 residue, and a digital scale on top of the wall cabinets
 14 in the kitchen." Do you see that?

15 A Yes.

16 Q But you have no independent recollection of
 17 search to confirm or deny that evidence being found in
 18 the apartment, correct?

19 A Correct.

20 Q Okay. Then it says, "Mr. Seward was not in
 21 the apartment at the time," right?

22 A Correct.

23 Q And then Officer Puff writes, "I then received
 24 information that Mr. Seward was at the Bungalow Bar
 25 located at 523 South Fulton Avenue." Do you see that?

Page 182

1 A I do.

2 Q Do you know who provided the information that
 3 I've just read in Officer Puff's report to Officer Puff?

4 A I do not. This report is written by Officer
 5 Puff, correct?

6 Q That's my understanding. Do you have a memory
 7 of there being information provided while you all were
 8 at the house, at the apartment?

9 A I don't recall any.

10 Q Do you know how Officer Puff was receiving
 11 information when he was at the apartment?

12 A I don't.

13 Q Were there undercover officers at the Bungalow
 14 Bar to your knowledge?

15 A I can't say. I wasn't there.

16 Q Do you know if the confidential informant that
 17 Officer Puff was relying on was at the Bungalow Bar?

18 A Can you repeat the question again?

19 MR. BUSHNELL: No. And we can -- and Heather,
 20 sorry to interrupt real quick. Anything that would
 21 go towards, you know, ascertaining the identity of a
 22 confidential informant should be marked confidential
 23 under seal and not asked in the presence of
 24 Plaintiff.

25 MS. DONNELL: Well, I'm not asking about the

Page 184

1 identity. I'm just asking if the person was there,
 2 but if you want that question under seal --

3 MR. BUSHNELL: I'm not going to direct him not
 4 to answer that. I'm just saying, you asked before
 5 if any of those three women were the CI --

6 MS. DONNELL: Oh, I see. I'm sorry.

7 MR. BUSHNELL: I would just appreciate --

8 MS. DONNELL: Sure. Thank you for reminding
 9 me. Yeah. That's fair. I'm sorry. I won't ask
 10 the identity. Okay. Unless we put under seal and I
 11 asked Mr. Seward to leave. Understood.

12 BY MS. DONNELL:

13 Q Okay. This part that Officer Puff wrote, "I
 14 then received information that Mr. Seward was at the
 15 Bungalow Bar," you have no knowledge about who provided
 16 that information, correct?

17 A No knowledge. No.

18 Q Okay. And then it says, "Sergeant Fegan,
 19 Detective Antonini, PO Salazar, and PO Palmer remained
 20 in the apartment." Do you see that?

21 A Yes.

22 Q Okay. Do you know Police Officer Salazar and
 23 Police Officer Palmer?

24 A Salazar, I have no idea who that is. And
 25 Palmer, I believe she just transferred out of the Mount

Page 185

1 Vernon to go to another department.

2 Q Okay. Officer Puff wrote, "Sergeant Quinoy,
 3 PO King, PO Hutchins, PO Valente, and myself responded
 4 to the Bungalow Bar to investigate." Do you see that in
 5 Exhibit 9?

6 A Yes.

7 Q Okay. And this part you're saying you weren't
 8 present for, correct?

9 A Correct.

10 Q Okay. So I want to call -- so anything that
 11 Officer Puff wrote about what transpired at the Bungalow
 12 Bar, your testimony is you had no knowledge of, correct?

13 A Correct.

14 Q Okay. I'm going to call your attention to the
 15 bottom paragraph under, "Additional narrative." Do you
 16 see this? Where it says, "Mr. Seward was transported
 17 from the Bungalow Bar to 156 South First Avenue,
 18 Apartment 4N." Do you see that?

19 A Yes.

20 Q Does that refresh your recollection that
 21 Mr. Seward was brought back to 156 South Avenue,
 22 Apartment 4N while you were still there?

23 A No.

24 Q Okay. And so that has not refreshed your
 25 recollection in any way, as to Mr. Seward being in the

Page 186

1 apartment with you on November 7, 2017, correct?

2 A Correct.

3 Q Okay. Okay. It says then that, "There were
4 no further narcotics found in the apartment. It was
5 turned over to the lessee, Ms. Thompson at approximately
6 2110 hours." Do you see that -- do you see that?

7 A Yes.

8 Q Okay. And "At the conclusion of the search,
9 Mr. Seward was transported to the MVPD, and booked by
10 Detective Sergeant Fegan on the above charges." Do you
11 see that?

12 A Yes.

13 Q Were you involved in booking or -- I'm sorry,
14 were you involved in transporting Mr. Seward back to the
15 police department?16 COURT REPORTER: Ms. Donnell, I'm sorry to
17 interrupt. I'm sorry to interrupt. I did not catch
18 that question. I think there was internet lag.19 MS. DONNELL: I am so sorry. Thanks for
20 letting me know.

21 BY MS. DONNELL:

22 Q I asked, did you transport Mr. Seward back to
23 the police department?

24 A I don't recall. No.

25 Q Meaning you could have, you don't recall one

Page 187

1 way or the other, correct?

2 Q I don't recall.

3 A Right. Meaning you could have, you just don't
4 recall one way or the other, right?

5 MR. BUSHNELL: Objection, guys.

6 A I don't recall.

7 Q Okay. Well then, it's possible that you did
8 transport him, you just don't recall, correct?

9 A And possible that I didn't.

10 Q Okay. Did you have any information about
11 Mr. Seward in any of his -- well, strike that. Prior to
12 going to the apartment on November 7, 2017, to execute
13 the search warrant, were you provided any information
14 pertaining to Mr. Seward's arrest record or criminal
15 history; if you recall?

16 A No. No. I don't recall, ma'am.

17 Q Prior to going to execute the search warrant
18 at 156 South First Avenue, were you provided any
19 information about any prior searches of Mr. Alan Seward
20 that you recall?

21 A No. I don't recall.

22 MS. DONNELL: Okay. I'm going to have you look
23 at Exhibit 11. Do you have Exhibit 11, Steve, for
24 the witness?

25 (EXHIBIT 11 MARKED FOR IDENTIFICATION)

Page 188

1 MR. BUSHNELL: I should, yeah. One second.

2 MS. DONNELL: Let me know when you've got it.
3 I'm sorry. Do you have Exhibit 11 now?

4 MR. BUSHNELL: Yeah. Sorry --

5 BY MS. DONNELL:

6 Q I'm sorry. I was waiting for you guys. Okay.
7 Detective Antonini, I have in front of you what I've
8 previously designated as Exhibit 11 to your deposition,
9 which is a felony complaint arrest warrant for the "City
10 Court, City of Mount Vernon, County of Westchester,"
11 for, "MV case number 17-4539." Do you recognize your
12 signature on this felony complaint?

13 A I do.

14 Q Okay. And is it -- you signed this on April
15 24, 2018?

16 A Yes.

17 Q Okay. And it says this is a felony complaint
18 against Mr. Alan Seward, correct?

19 A Yes.

20 Q Okay. And what information did you -- well,
21 do you remember swearing out this complaint -- I'm
22 sorry, this arrest warrant?

23 A This arrest warrant?

24 Q Yeah.

25 A No. I don't remember right now.

Page 189

1 Q Okay. Do you remember what information you
2 obtained before you prepared it?3 A The information that was given to me by
4 Officer Puff to go and file to the District Attorney's
5 Office.

6 Q Uh-huh.

7 A Specific if I remember the details. No. I do
8 not.9 Q So is it your testimony that the information
10 that you used to out this arrest warrant you obtained
11 from Officer Puff; is that right?

12 MR. BUSHNELL: Objection. You can answer.

13 A No. I don't remember it specifically. No.

14 Q I'm saying that the information, did you --
15 what did you do to get the information --

16 A You have to come a little closer to the mic --

17 Q I'm sorry. What did -- what did you do to get
18 the information before you swore out the felony
19 complaint?20 A This is of the information that was provided
21 to the assistant district attorney. Yeah. Allow me to
22 explain?

23 Q Yeah, please.

24 A All right. So in some instances, there's been
25 situations where the arresting officer or the case

Page 190

1 detective cannot respond to the District Attorney's
 2 Office, in order to file the charges for the individual.
 3 So in cases like this, they'll ask somebody if they
 4 could go upstairs to the District Attorney's Office and
 5 file the charges for that individual. So the fact that
 6 my signature is in this here felony complaint, not
 7 necessarily means that I filed the charges specifically
 8 for Alan Seward. Other than I provided the information
 9 given to me, to the District Attorney's Office, in order
 10 to file the charges for Alan Seward. So my signature
 11 pretty much validates.

12 MR. BUSHNELL: And Heather, you might be
 13 getting confused too, if I may at this point. Did
 14 you read through this? I think this relates to a
 15 different incident based on what I'm reading here in
 16 the information section.

17 MS. DONNELL: Yeah. Well, I think it's part of
 18 the -- that gets re -- like a revised one. But I
 19 think there's some mistakes in it. Yeah. I mean, I
 20 think the date's wrong.

21 MR. BUSHNELL: So --

22 MS. DONNELL: I don't want to -- I want to ask
 23 the witness questions about it.

24 MR. BUSHNELL: Yeah, of course. Of course. I
 25 just wanted to make sure he knows what's he looking

Page 192

1 Q Why was this complaint being filed in April
 2 24, 2018?
 3 A Because that's when the complaint was filed
 4 for the incident of Alan Seward selling to an undercover
 5 officer,

6 Q But you had nothing to do with that undercover
 7 controlled buy?

8 A My duty was -- I was the assigned case
 9 detective for the whole entire operation. So when the
 10 undercover officer went into the location and purchased
 11 the drugs from Alan Seward, I was not next to the
 12 undercover officer at the time. No. I wasn't.

13 Q Were you part of the surveillance? Or were
 14 you in any way part of the operation?

15 A I was part of the operation and the
 16 surveillance.

17 Q Okay. On October 19, 2017 at 3:00 p.m., where
 18 were you?

19 A Working.

20 Q Were you at the station? Were you --

21 A In the field.

22 Q Okay. How long -- what was that operation
 23 called, that this felony warrant was a part of?

24 A I don't remember the name of the operation.

25 Q How long was the operation -- well, how long

Page 191

1 at.

2 MS. DONNELL: So let me do that. Yeah. But I
 3 don't want coach the witness --

4 BY MS. DONNELL:

5 A Just so -- look this over. So this felony
 6 complaint has nothing to do with the incident that
 7 happened on November -- what, 7th with Detective Puff.
 8 This felony complaint is a totally different complaint
 9 than the incident that happened with Detective Puff and
 10 Alan Seward's search warrant.

11 Q Okay. Well, then -- please explain then for
 12 me?

13 A This is a totally different incident.

14 Q So you arrested Alan on October 19, 2017 at
 15 3:00 p.m. in front of 156 South First Street?

16 A I did not. No.

17 Q Who did?

18 A The arresting officer at the time -- which I
 19 can't remember who did.

20 Q Where did you get the information to swear out
 21 that felony affidavit -- the felony complaint?

22 A This complaint was in regards to a narcotics
 23 operation conducted utilizing undercover officers, in
 24 which an undercover officer purchased narcotics from
 25 Alan Seward. So this is why this complaint was filed.

Page 193

1 did the operation last?

2 A A couple of months. Four or five months,
 3 maybe.

4 Q What was the purpose of the operation?

5 A To utilize undercover officers to buy illegal
 6 narcotics from individuals that were selling.

7 Q Did you use any confidential informants in
 8 this particular operation?

9 A Yes. We did.

10 Q How many?

11 A I can't say how many, but we did.

12 Q Was this operation a joint task force -- a
 13 joint operation --

14 A Yes.

15 Q -- with what other agencies?

16 A Westchester County Police Department.

17 Q Anyone other than Westchester County Police
 18 Department?

19 A No.

20 Q Was the search conducted on November 7, 2017
 21 of 156 South First Avenue, was that part of this
 22 operation as well?

23 A No.

24 Q Was Officer Puff also assigned to the
 25 operation?

<p>1 A The whole unit.</p> <p>2 Q It was a whole --</p> <p>3 A The whole narcotics unit.</p> <p>4 Q Okay. But you said you were the case officer.</p> <p>5 Did you have a special role for this operation?</p> <p>6 A Yes. I was the case -- the whole operation</p> <p>7 -- the case detective.</p> <p>8 Q What does that mean? Define what the case</p> <p>9 detective means for the operation?</p> <p>10 A Meaning I was in charge of the whole operation</p> <p>11 investigation, per se.</p> <p>12 Q What were your responsibilities and duties?</p> <p>13 A Conduct my reports, secure evidence, obtain</p> <p>14 reports from surveillance and undercover officers.</p> <p>15 Q Were you authorized to use wires -- like wire</p> <p>16 taps for this for surveillance, for this operation?</p> <p>17 A This was not a wire tap investigation.</p> <p>18 Q Okay. So by surveillance, you mean just</p> <p>19 physically surveilling out on the street?</p> <p>20 A Correct.</p> <p>21 Q And you said it operated for about four to</p> <p>22 five months?</p> <p>23 A Give or take. Yes.</p> <p>24 Q And was April 2018 towards the end of the</p> <p>25 investigation -- or operation?</p>	<p>Page 194</p> <p>1 too.</p> <p>2 MS. DONNELL: Well, I'll talk to you. You</p> <p>3 could jump off for now and then I'm going to give</p> <p>4 you a call. Okay?</p> <p>5 COURT REPORTER: Ms. Donnell, I can just put</p> <p>6 him in the waiting room so he doesn't have to log</p> <p>7 out of the meeting.</p> <p>8 MS. DONNELL: Oh, sure. That's okay. Mr.</p> <p>9 Seward, we'll just put you in the waiting room.</p> <p>10 MR. SEWARD: Okay.</p> <p>11 COURT REPORTER: Okay. He is now in the</p> <p>12 waiting room, and I can get him whenever everyone is</p> <p>13 ready.</p> <p>14 (CONFIDENTIAL PORTION IV REDACTED)</p> <p>15 MR. BUSHNELL: Heather, do you have any idea</p> <p>16 how much longer you're going to be? I'm just</p> <p>17 asking, because my client has to pick up his</p> <p>18 daughter later, so...</p> <p>19 MS. DONNELL: Oh, sure. I think under an hour.</p> <p>20 MR. BUSHNELL: Okay</p> <p>21 MS. DONNELL: Is that okay?</p> <p>22 MR. BUSHNELL: Yeah, sure. Let's get back at</p> <p>23 3:45 then; is that okay?</p> <p>24 MS. DONNELL: Yep.</p> <p>25 MR. BUSHNELL: Great. Thank you so much.</p>
<p>1 A No.</p> <p>2 Q When was the end of the operation?</p> <p>3 A April 19, 2017 was the date that the</p> <p>4 undercover buy took place with Mr. Alan Seward, and</p> <p>5 April 24, 2018 was the date that this was -- the</p> <p>6 complaint was signed.</p> <p>7 Q And I'm asking about the overall operation.</p> <p>8 What was the duration?</p> <p>9 A I don't remember the exact date when it ended,</p> <p>10 but the date that is in here was the date that this</p> <p>11 complaint was signed.</p> <p>12 Q Okay. How many arrests were made as part of</p> <p>13 this operation?</p> <p>14 MR. BUSHNELL: Objection. You can answer.</p> <p>15 A I don't recall.</p> <p>16 Q Did you receive any recommendations or rewards</p> <p>17 for your work on this particular operation?</p> <p>18 A I don't recall.</p> <p>19 MS. DONNELL: Okay. Mr. Seward, I'm going to</p> <p>20 ask some questions of Detective Antonini that are</p> <p>21 going to be considered confidential and pursuant.</p> <p>22 So you're going to have to drop off and then I can</p> <p>23 call you when you can jump back on, okay, Mr.</p> <p>24 Seward?</p> <p>25 MR. SEWARD: Yes. I have a couple of questions</p>	<p>Page 195</p> <p>Page 197</p> <p>1 VIDEOGRAPHER: Okay. Off the record at 3:39</p> <p>2 p.m.</p> <p>3 (OFF THE RECORD)</p> <p>4 VIDEOGRAPHER: We are back on the record at</p> <p>5 3:49 p.m.</p> <p>6 BY MS. DONNELL:</p> <p>7 Q Detective Antonini, I'm going to play for you,</p> <p>8 which I'm designating as Exhibit 26 to your deposition.</p> <p>9 It's a video recording that was produced by the</p> <p>10 Defendant City in this action as I think Exhibit B. And</p> <p>11 so I'm going to share my screen and play it for you, and</p> <p>12 then ask you some questions about it. I might stop it</p> <p>13 along the way, but I'll start now and hopefully this'll</p> <p>14 work. Let me know if you can see and hear it. Okay?</p> <p>15 Okay. Can you see it? I haven't -- can you see that on</p> <p>16 your screen?</p> <p>17 (EXHIBIT 26 MARKED FOR IDENTIFICATION)</p> <p>18 A Yes.</p> <p>19 Q Okay. Let me go back to the beginning and</p> <p>20 start playing. Okay. I'm going to start playing at</p> <p>21 timestamp zero. Fortunately, the -- hold on just a</p> <p>22 second. My apologies.</p> <p>23 MS. ACQUISTO: 24, right? Oh yeah. Maybe</p> <p>24 you're right.</p> <p>25 Q I don't know why it's stopping. Detective</p>

<p style="text-align: right;">Page 198</p> <p>1 Antonini, can you hear that? Was that your voice?</p> <p>2 A Can't hear it.</p> <p>3 MR. BUSHNELL: We can't hear anything.</p> <p>4 MS. DONNELL: You couldn't hear anything? Let</p> <p>5 me go back again and see. Okay. Let me try again.</p> <p>6 I'm going to pause there at timestamp 11.</p> <p>7 BY MS. DONNELL:</p> <p>8 Q Detective Antonini, is that your voice?</p> <p>9 MR. BUSHNELL: We can't hear anything, Heather.</p> <p>10 MS. DONNELL: Oh, you can't. Phooey. Okay.</p> <p>11 Let me see what I can do. Usually that works. So</p> <p>12 you're not hearing any of the audio?</p> <p>13 A No.</p> <p>14 COURT REPORTER: Myself and Krystal might be</p> <p>15 able to help you out, if you would like to go off</p> <p>16 record for a moment.</p> <p>17 MS. DONNELL: Sure. Let's go off record and</p> <p>18 see if we can get the technical stuff worked out.</p> <p>19 (OFF THE RECORD)</p> <p>20 VIDEOGRAPHER: Back on the record at 3:52 p.m.</p> <p>21 My apologies.</p> <p>22 BY MS. DONNELL:</p> <p>23 Q Okay. Detective Antonini, we're going to try</p> <p>24 this again and see if it will work to share the video.</p> <p>25 Can you hear me right now?</p>	<p style="text-align: right;">Page 200</p> <p>1 work for me.</p> <p>2 COURT REPORTER: Sorry to interrupt again,</p> <p>3 Ms. Donnell, but if you would like Krystal or myself</p> <p>4 to play it --</p> <p>5 MS. DONNELL: Yeah.</p> <p>6 COURT REPORTER: I can send you a Dropbox link</p> <p>7 or e-mail address and we can try and do that for</p> <p>8 you.</p> <p>9 BY MS. DONNELL:</p> <p>10 Q I think let's try that because I think mine's</p> <p>11 going to keep lagging. I'm not quite sure why. It</p> <p>12 usually works for me, but for some reason it's not right</p> <p>13 now. So, let's try that. Can we go off the record and</p> <p>14 I will try -- is it working now?</p> <p>15 (VIDEO PLAYS)</p> <p>16 (VIDEO STOPS)</p> <p>17 A Yes.</p> <p>18 MS. DONNELL: I think it's -- here, I'm going</p> <p>19 to just pause it and try sending it, because I think</p> <p>20 it's going to work better that way. I'm so sorry,</p> <p>21 you guys. So let's go off the record and if you</p> <p>22 guys -- if you put your e-mail in the chat, I'll do</p> <p>23 it really quick.</p> <p>24 COURT REPORTER: Yes, ma'am.</p> <p>25 VIDEOGRAPHER: Okay. Off the record at 3:55</p>
<p style="text-align: right;">Page 199</p> <p>1 A Yes.</p> <p>2 Q Okay. Let's try it again. Let's see if I can</p> <p>3 -- that did not work, did it? Sometimes it works so</p> <p>4 easy and sometimes it doesn't. Let me try again. Thanks</p> <p>5 for your patience. Okay. Can you -- oh, let's see.</p> <p>6 Okay. Let's see. All right. Let's try it now. Can you</p> <p>7 see the video right now?</p> <p>8 A Yes.</p> <p>9 Q Okay. Let me see if this is going to work to</p> <p>10 play it.</p> <p>11 (VIDEO PLAYS IN FULL)</p> <p>12 (VIDEO STOPS)</p> <p>13 Q Could you hear that before it lagged?</p> <p>14 A Yes.</p> <p>15 Q Okay. I'm so sorry. I think it's having</p> <p>16 trouble doing all of the things I'm asking it to do. Was</p> <p>17 that -- do you recognize your voice?</p> <p>18 A That is my voice.</p> <p>19 Q Okay. Let me try it again.</p> <p>20 (VIDEO PLAYS)</p> <p>21 THE WITNESS: 156 South First Avenue.</p> <p>22 (VIDEO STOPS)</p> <p>23 MS. DONNELL: It's pausing at timestamp six.</p> <p>24 Let me see if I can move it forward. I'm going to</p> <p>25 start playing at timestamp 10. It doesn't want to</p>	<p style="text-align: right;">Page 201</p> <p>1 p.m.</p> <p>2 (OFF THE RECORD)</p> <p>3 VIDEOGRAPHER: We are back on the record at</p> <p>4 4:02 p.m.</p> <p>5 BY MS. DONNELL:</p> <p>6 Q Okay. Now we've been able to get some</p> <p>7 assistance on the technology from our court reporter.</p> <p>8 Detective Antonini, I'm going to have Aalayah play</p> <p>9 Exhibit 26 for you. Maybe we'll play it once all the</p> <p>10 way through, and then I can ask you some questions about</p> <p>11 it, so let's go and ahead and play Exhibit 26.</p> <p>12 (VIDEO PLAYS IN FULL)</p> <p>13 (VIDEO STOPS)</p> <p>14 BY MS. DONNELL:</p> <p>15 Q Okay. Detective Antonini, were you able to</p> <p>16 view and hear all of Exhibit 26?</p> <p>17 A Yes.</p> <p>18 Q And was that the video that you testified</p> <p>19 earlier that you reviewed prior to your deposition</p> <p>20 today?</p> <p>21 A Yes.</p> <p>22 Q And to your knowledge, is that the only video</p> <p>23 that exists from the November 7, 2017 incident?</p> <p>24 A To my knowledge. Yes.</p> <p>25 Q And that's the only one you've ever seen to</p>

<p style="text-align: right;">Page 202</p> <p>1 prepare for your deposition; is that right?</p> <p>2 A Yes.</p> <p>3 Q Okay. And this video appears to be one</p> <p>4 minute, 18 seconds; is that right?</p> <p>5 A Yes.</p> <p>6 Q And when you heard Exhibit 26 being played,</p> <p>7 you authenticated that that's your voice operating the</p> <p>8 video recorder?</p> <p>9 A Yes.</p> <p>10 Q And is that one seamless video taken -- like</p> <p>11 you kept -- push to record and kept it recording the</p> <p>12 whole time?</p> <p>13 A Yes.</p> <p>14 Q As you walked through the apartment; is that</p> <p>15 right?</p> <p>16 A Yes.</p> <p>17 Q Okay. Do you recall during -- and we could</p> <p>18 play it again if you need to see it, but in the video,</p> <p>19 when you look back towards the kitchen, there's an</p> <p>20 officer that you can see standing in the kitchen. Do</p> <p>21 you know what officer that is?</p> <p>22 A Sergeant Fegan.</p> <p>23 Q That's Sergeant Fegan. How about the officer</p> <p>24 that's standing in the bedroom when you go into the back</p> <p>25 bedroom?</p>	<p style="text-align: right;">Page 204</p> <p>1 - it does not appear to be in the apartment, correct?</p> <p>2 A I didn't see her during the video. No.</p> <p>3 Q And also the children don't appear to be</p> <p>4 depicted either; is that correct?</p> <p>5 A Correct.</p> <p>6 Q Is Officer Puff -- do you see or hear Officer</p> <p>7 Puff in your video?</p> <p>8 A No.</p> <p>9 Q Okay. When Mr. Seward was brought back to the</p> <p>10 apartment, you did not do any videotaping; is that</p> <p>11 right?</p> <p>12 A Correct.</p> <p>13 Q Okay. Cause if that was -- he was videotaped</p> <p>14 when he was in the apartment, that would be on this same</p> <p>15 piece of evidence; is that right?</p> <p>16 A I guess -- I don't -- I wouldn't know.</p> <p>17 Q Do you recall trying to videotape when</p> <p>18 Mr. Seward was in the apartment?</p> <p>19 MR. BUSHNELL: Objection. Go ahead.</p> <p>20 A No.</p> <p>21 Q Okay. So your testimony today is that this</p> <p>22 video was recorded immediately after you executed the</p> <p>23 search warrant, right?</p> <p>24 A Yes.</p> <p>25 Q Okay. But it was -- is it your testimony that</p>
<p style="text-align: right;">Page 203</p> <p>1 A Joseph Valente.</p> <p>2 Q That's Joseph Valenti. Okay. And then in</p> <p>3 this video, there's two women handcuffed sitting on the</p> <p>4 bed in the back, correct?</p> <p>5 A Yes.</p> <p>6 Q Okay. So -- and can you identify for me when,</p> <p>7 in the course of executing the search warrant, you did</p> <p>8 this video tape?</p> <p>9 A I want to say immediately after entering the</p> <p>10 apartment.</p> <p>11 Q Okay. You know how when we looked at the</p> <p>12 police report, I think it was Exhibit 15 -- or the</p> <p>13 incident report from Puff, there was three women who</p> <p>14 were located in the back bedroom when the search was</p> <p>15 conducted, and all three of those women were listed on</p> <p>16 the incident report. Do you remember that?</p> <p>17 A Yes.</p> <p>18 Q At this point when you were videotaping,</p> <p>19 there's only two African American women in the back</p> <p>20 bedroom handcuffed in the back, correct?</p> <p>21 A Yes.</p> <p>22 Q Do you have any information or knowledge as to</p> <p>23 where the third woman is?</p> <p>24 A No.</p> <p>25 Q When you were doing this videotape, you have -</p>	<p style="text-align: right;">Page 205</p> <p>1 it was before Officer Puff returned with Sergeant Quinoy</p> <p>2 and Mr. Seward back to the apartment?</p> <p>3 A This video was done immediately after the</p> <p>4 search warrant.</p> <p>5 Q Okay. Understood. Okay. And again, I guess,</p> <p>6 based on your practice, when you were the videographer</p> <p>7 for one of the search warrants, if you videotaped, you</p> <p>8 know, after the search warrant was conducted, or if</p> <p>9 there was a strip search conducted at the apartment</p> <p>10 pursuant to this search warrant, it would have all been</p> <p>11 part of the same videotape evidence, correct?</p> <p>12 A Correct.</p> <p>13 Q Okay. And it would've been secured as</p> <p>14 evidence just like this video tape was, right?</p> <p>15 A Yes.</p> <p>16 Q Okay. So seeing the video again, that I</p> <p>17 designated as Exhibit 26 to your deposition, refresh</p> <p>18 your recollection to the events of November 7, 2017 in</p> <p>19 any way?</p> <p>20 A Yes. It assures that I was not at the</p> <p>21 Bungalow.</p> <p>22 Q Why does that ensure for you that you were not</p> <p>23 at the Bungalow?</p> <p>24 A Because in your -- in the lawsuit, it says</p> <p>25 that I was at the Bungalow, right?</p>

Page 206

1 Q Yes. But why does the video mean for you that
 2 you didn't go to the Bungalow?

3 A Kind of proves that I was not at the Bungalow.

4 Q I know, explain.

5 A I was not at the Bungalow.

6 Q Okay. But why does the video prove that?

7 A You hear my voice in the video? Correct.

8 Q Understood. But you could videotape and then
 9 go to the Bungalow, correct?

10 A No.

11 Q Okay. Not according to your view. Okay. So
 12 let's see. Aalayah, I think you can take down Exhibit
 13 26. Do you use a memo book in your -- like a department
 14 issued memo book, in your capacity as a narcotics
 15 officer?

16 A Note take -- just to take notes.

17 Q What kind of notes do you take?

18 A Things you want to remember, phone numbers,
 19 you know, nothing specific.

20 Q I see. Is there anything that the department
 21 trains you on to put into your memo book?

22 A Unless you are assigned to the patrol division
 23 -- the patrol division, you have to notate your daily
 24 log in that memo book.

25 Q I see. But when you're a narcotics officer,

Page 207

1 you don't have that same obligation?

2 A No. It's just note taking.

3 Q Did you take any notes in your memo book on
 4 November 7, 2017?

5 A Search warrant date?

6 Q Yes.

7 A No.

8 Q Have you searched your -- do you have your
 9 memo book from back --

10 A No.

11 Q I'm sorry. Just make -- let me get the
 12 question all out. Do you have your memo book anymore
 13 from November 2017?

14 A No.

15 Q Why not?

16 A It's -- there was no need for me to keep it.

17 Q Did you destroy it?

18 A I don't know what happened to it. Probably
 19 garbage, by now.

20 Q When you fill up a memo book, do you throw it
 21 away, typically?

22 A When there's no more pages in it. Yes.

23 Q Okay. So you don't -- you only have a memo
 24 book, like one memo book at a time?

25 A It's books to write notes in. It's not a

Page 208

1 issue -- department issue for us to keep tabs of
 2 everything that's happening. It's just something to
 3 write on like scrapbook -- memo book. Unless you are
 4 assigned to the patrol division where those books are
 5 kept, you know, as records.

6 Q Okay. But a narcotics officer -- like if you
 7 were going to interview a suspect or make an arrest,
 8 would you note that in your memo book as a narcotics
 9 officer?

10 A No. You can notate it on pieces of paper,
 11 depending on what you are using. And if you need those
 12 notes for some evidential value, then you will submit
 13 those notes into evidence, but no.

14 Q You know this operation you were testifying
 15 earlier to, that occurred in the 2017, 2018 time period
 16 for four to five months. Has it refreshed your
 17 recollection of the name of that operation?

18

19

20

21 A No.

22 Q Who else worked with you on it?

23 A In regards to what? Who else, meaning?

24 Q Well, you were the case officer, like the lead
 25 officer; is that right?

Page 209

1 A Yes.

2 Q But did other narcotics officers assist you in
 3 that operation?

4 A Yeah. The whole narcotics unit.

5 Q Okay. And was Sergeant Fegan your supervising
 6 officer during that operation?

7 A Yes.

8 Q How many operations did you work on while you
 9 were a narcotics officer?

10 A Numerous, can't recall a specific number.

11 Q How many were you assigned as the case
 12 officer?

13 A Numerous.

14 Q More than five?

15 A More or less, yes.

16 Q Do you remember the names that were assigned -
 17 - I mean, is it fair to say that anytime you had like an
 18 operation there was given a sort of name that the
 19 department would refer to it as?

20 A Usually. Yes.

21 Q Okay. Do you remember any of the names of the
 22 operations you were assigned as the case officer -- as a
 23 narcotic officer?

24 A No.

MR. BUSHNELL: Objection. Go ahead.

<p>1 Q None of them?</p> <p>2 A Correct.</p> <p>3 Q Do you remember the focus of any of the</p> <p>4 operations?</p> <p>5 MR. BUSHNELL: Objection. Go ahead.</p> <p>6 A To target individuals selling illegal</p> <p>7 narcotics in the City of Mount Vernon.</p> <p>8 Q But like -- did any of them like have a focus</p> <p>9 let's say on heroin, or a different one on PCP, or a</p> <p>10 different one on crack? Did they ever have a focus like</p> <p>11 that, or certain area of the city, or anything like</p> <p>12 that?</p> <p>13 A Any and all illegal narcotics in anywhere</p> <p>14 throughout the City of Mount Vernon.</p> <p>15 Q So what was the difference between having an</p> <p>16 operation and just, like, being an narcotics officer?</p> <p>17 MR. BUSHNELL: Objection. Go ahead.</p> <p>18 A Because you're trying to target as many</p> <p>19 individuals all at once, while utilizing the services of</p> <p>20 another department providing an undercover officer.</p> <p>21 Whereas, if it's just the City of Mount Vernon,</p> <p>22 conducting daily operations, it's different. You're</p> <p>23 just utilizing somebody else's services in order to --</p> <p>24 Q I see. So it makes it an operation is when</p> <p>25 you use the assistance of another law enforcement agency</p>	<p>Page 210</p> <p>1 unmarked department vehicle.</p> <p>2 Q Thank you. So for narcotics officers, you</p> <p>3 used unmarked vehicles, right?</p> <p>4 A Correct.</p> <p>5 Q Did they have, like, a specific -- like, could</p> <p>6 you tell by the license plate that it was a police</p> <p>7 department car? Like, did it have like an MP, like a</p> <p>8 municipal license plate or was it completely unmarked?</p> <p>9 Like, it would look like a civilian car?</p> <p>10 A It would look like a civilian car most times,</p> <p>11 or it would look like a regular police car without</p> <p>12 emblems or anything on it.</p> <p>13 Q Got it. Back in 2017, was there certain cars</p> <p>14 that the narcotics units was assigned regularly; do you</p> <p>15 remember?</p> <p>16 A I don't remember. I don't recall, because</p> <p>17 cars came and went very frequently with our unit, that</p> <p>18 they were very unreliable.</p> <p>19 Q Were you guys sometimes using cars that had</p> <p>20 been possessed as part of an arrest?</p> <p>21 A To my knowledge, no. We hardly came across</p> <p>22 vehicles that were confiscated if that's what You mean?</p> <p>23 Q Yeah. What -- do you remember what car you</p> <p>24 were assigned on this shift on November 7, 2017?</p> <p>25 A No.</p>
<p>Page 211</p> <p>1 either to provide somebody undercover or some other</p> <p>2 support service. That's what made it considered an</p> <p>3 operation versus regular narcotics unit conduct?</p> <p>4 A You could say that. Yes.</p> <p>5 MS. DONNELL: Okay. Okay. I might be done,</p> <p>6 but I want to look at my notes. So maybe I could</p> <p>7 have five minutes and then we could come back on.</p> <p>8 MR. BUSHNELL: You got it.</p> <p>9 VIDEOGRAPHER: Okay. We are going off the</p> <p>10 record at 4:15 p.m.</p> <p>11 (OFF THE RECORD)</p> <p>12 VIDEOGRAPHER: Back on the record at 4:20 p.m.</p> <p>13 BY MS. DONNELL:</p> <p>14 Q Detective Antonini, I just have a few --</p> <p>15 hopefully just a few questions for you. First of all,</p> <p>16 do you remember -- well in fact, when you worked as a</p> <p>17 narcotics officer, would you be issued a department car</p> <p>18 to drive around on your shifts?</p> <p>19 A No.</p> <p>20 Q Would you --</p> <p>21 A You take what's available.</p> <p>22 Q But it was like a department issued car,</p> <p>23 right? Not your personal car. You'd use a department -</p> <p>24 -</p> <p>25 A Oh, yes. It's a department vehicle. It's an</p>	<p>Page 213</p> <p>1 Q No idea. Okay. Okay. And I think I forgot</p> <p>2 to ask you; did you have a -- what was your highest rank</p> <p>3 when you were a Marine?</p> <p>4 A Sergeant.</p> <p>5 Q Okay. And did you have any specific jobs as a</p> <p>6 sergeant or roles?</p> <p>7 A Infantry.</p> <p>8 Q You were infantry. Okay. And you said you</p> <p>9 had received some college credit. Do you remember the</p> <p>10 college credit you received or the courses you got while</p> <p>11 you were a Marine?</p> <p>12 A No. The courses that we received throughout</p> <p>13 my Marine Corps career were deemed college credit. The</p> <p>14 -- you get college credits for them. Most of them were</p> <p>15 usually infantry related, you know, leadership courses</p> <p>16 and stuff like that. I accumulated enough credits to</p> <p>17 have -- possibly an Associate's degree.</p> <p>18 Q But did you ever get an Associate's degree?</p> <p>19 A No.</p> <p>20 MS. DONNELL: Okay. I think that that's all I</p> <p>21 have for you at this time. Thank you so much for</p> <p>22 your time. Would you like to reserve signature,</p> <p>23 Steve?</p> <p>24 MR. BUSHNELL: Yes. Thank you.</p> <p>25 MS. DONNELL: Okay. So witness will reserve</p>

<p>1 signature.</p> <p>2 MR. BUSHNELL: I should have said that at the</p> <p>3 beginning. Sorry.</p> <p>4 MS. DONNELL: No problem. We can go off the</p> <p>5 record.</p> <p>6 COURT REPORTER: Okay. Before we go off the</p> <p>7 record, Ms. Donnell, how would you like your copy?</p> <p>8 MS. DONNELL: I can just get a regular e-tran.</p> <p>9 COURT REPORTER: Okay.</p> <p>10 MS. DONNELL: And I don't need a copy of the</p> <p>11 video.</p> <p>12 COURT REPORTER: Okay, great. And Steven?</p> <p>13 MR. BUSHNELL: I'm not going to be requesting a</p> <p>14 copy, because Ms. Donnell will serve us with a copy</p> <p>15 to be signed and we'll get that one.</p> <p>16 VIDEOGRAPHER: Okay. Then I'll take us -- us</p> <p>17 officially off --</p> <p>18 MR. BUSHNELL: Have you -- we're still on the</p> <p>19 record. I'm sorry.</p> <p>20 COURT REPORTER: We are. I will have Krystal</p> <p>21 take us officially off. Okay. Yeah.</p> <p>22 VIDEOGRAPHER: And I'm sorry, just for</p> <p>23 clarification, the video for you, Steven?</p> <p>24 MR. BUSHNELL: No. Sorry. Thank you.</p> <p>25 VIDEOGRAPHER: All right.</p>	<p>Page 214</p> <p>1 CERTIFICATE OF REPORTER</p> <p>2 STATE OF ILLINOIS</p> <p>3</p> <p>4 I do hereby certify that the witness in the foregoing</p> <p>5 transcript was taken on the date, and at the time and</p> <p>6 place set out on the Stipulation page hereof, by me</p> <p>7 after first being duly sworn to testify the truth, the</p> <p>8 whole truth, and nothing but the truth; and that the</p> <p>9 said matter was recorded by me and then reduced to</p> <p>10 typewritten form under my direction, and constitutes a</p> <p>11 true record of the transcript as taken, all to the best</p> <p>12 of my skill and ability. I certify that I am not a</p> <p>13 relative or employee of either counsel and that I am in</p> <p>14 no way interested financially, directly or indirectly,</p> <p>15 in this action.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20 <i>Aalyah Rell</i></p> <p>21</p> <p>22 AALAYAH PURNELL,</p> <p>23 COURT REPORTER/NOTARY</p> <p>24 MY COMMISSION EXPIRES: 11/15/2022</p> <p>25 SUBMITTED ON: 01/14/2022</p>
<p>1 MR. BUSHNELL: At this time.</p> <p>2 VIDEOGRAPHER: Okay. And we are now officially</p> <p>3 off the record at 4:24 p.m.</p> <p>4 (DEPOSITION CONCLUDED AT 4:24 P.M.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 215</p>

Exhibits	13 138:21,25 139:8	2	187:12 191:14 192:17 193:20 195:3 201:23 2 112:13,17,23 113:4,13 116:10 126:13 128:20 139:18, 21	3:00 191:15 192:17 3:39 197:1 3:45 196:23 3:49 197:5 3:52 198:20
EXHIBIT 2_ ANOTNINI 112:17,23 113:4,12,13 126:13 128:20	15 36:25 98:25 179:21,22 203:12 15-CV-5635 144:21	20 36:25 152:22 200 42:24,25 2000 98:25 2002 25:18 2003 25:18 2006 24:21 1600 43:6,11, 13 17 172:17 17' 180:1 17-4539 188:11 18 41:8 47:22 112:21 202:4 18-CV-9068 145:21 19 155:21 191:14 192:17 195:3 19-CV-5230 145:14 1945 179:11 180:2 1983 139:18 140:1 1993 112:21 1999 26:1 29:25 1:00 55:13 1:20-cv-9251 7:14 1:35 138:17	2018 146:1,6, 13 155:21 188:15 192:2 194:24 195:5 208:15 2019 58:13 2020 60:14 2021 15:17 46:1 48:25 54:10 56:4 138:23 2022 7:8 2110 186:6 22 138:23 23rd 31:11,13, 21 2400 43:13 25 48:20 25th 17:6 26 197:8,17 201:9,11,16 202:6 205:17 206:13 26th 31:22 27th 17:5 2:25 161:8 2:34 161:11 2:42 166:14 2:46 166:17 3 3 24:22 112:13 3.045 112:11, 18 128:19 177:7 178:25 181:14 186:1	4 4:00 43:6 4:02 201:4 4:15 211:10 4:20 211:12 4:24 215:3,4 4N 180:17,22 185:18,22 5 5 126:14,15,19, 21 127:5,9,11, 14,17 149:9,21 50 118:25 523 182:25 6 6:00 55:12 7 7 16:10,15 18:7 161:15,25 162:4,9,14,18, 21,25 163:6,17 165:15 167:5, 20 168:5 169:17,19 174:22 175:7
EXHIBIT 5_ ANOTNINI 126:14,15,19, 21 127:5,9,11, 14,17	156 161:24 163:9,17,22 167:5,19 169:14 171:10, 18 176:19 180:6,16 185:17,21 187:18 191:15 193:21 199:21			
EXHIBIT 9_ ANOTNINI 178:4,6,7 185:5				
EXHIBIT 11_ ANOTNINI 187:23,25 188:3,8				
EXHIBIT 13_ ANOTNINI 138:21,25 139:8				
0				
0800 43:6,11				
1				
1 116:3				
10 126:18 199:25	19 155:21 191:14 192:17 195:3	2012 49:24 54:7 57:15 154:5,7,8,10 157:3	25th 17:6 26 197:8,17 201:9,11,16 202:6 205:17 206:13	5 126:14,15,19, 21 127:5,9,11, 14,17 149:9,21 50 118:25
101 7:7		2013 62:18		523 182:25
10:00 7:8 55:12		2015 126:18 128:5,12 149:9, 22 152:22 153:16,17		6
10:14 17:16		2017 16:10,15		6:00 55:12
11 187:23,25 188:3,8 198:6		18:7 136:16,20 137:5 161:15, 25 162:4,9,14, 18,21,25 163:6,		
11:12 64:8		17 164:7 165:12,15 167:5,20 168:5		
11:21 64:11		169:17,19		
11:49 88:9		172:14 174:22 175:7 176:6,13		
11:56 88:12		177:7 178:25		
12 179:21,22		181:14 186:1		
12:55 138:14				

176:6,13 177:7 178:25 180:1 186:1 187:12 193:20 201:23 205:18 207:4 212:24 730 7:6 78 178:19 7th 163:10 191:7 <hr/> 8 8 35:9 80 178:22 8:25 180:3 <hr/> 9 9 24:21 30:14 178:4,6,7 185:5 9:00 55:13 <hr/> A A-B-R-E-U 59:7 A-C-Q-U-I-S-T-O 8:6 a.m. 7:8 17:16 64:11 88:12 Aalayah 7:4 8:13 35:1 201:8 206:12 ability 40:20 96:13 Abrelo 59:3 Abreu 59:2,4,5, 12,14 Absolutely 8:11 92:6 124:7 130:15 152:23 161:7 177:9 academy 30:17,18 35:13, 19,21,22 36:17	37:9 38:7 43:20,22,23 98:14,19 99:6 100:2 accommodate 9:19 accordance 132:24 account 103:3 accumulated 213:16 accurate 16:9 24:20 54:16 96:2 97:3 137:25 182:8 acquaintance 50:10 53:8 acquired 121:17,22 Acquisto 8:4,5 10:2,4,8,11 126:20 197:23 act 119:21 148:6 action 142:17 197:10 actions 11:14 35:4 76:1,14,17 active 25:19,25 28:10,14 151:6 activity 44:25 actual 99:5 100:4 127:22 167:12 Addison 160:18,21 161:5 additional 32:13 35:25 37:11 140:5 185:15 address 32:7 200:7 admit 17:20 Adrian 180:16	advice 90:12 advised 133:6 affairs 52:13 affidavit 166:22 168:1 191:21 affirm 8:15 account 103:3 agencies 25:3, 6,11 27:20 28:8,16 193:15 agency 210:25 agree 126:7,10 ahead 8:13 18:17 23:11 44:18 51:5 53:2,12 64:2 75:7 93:3,14 134:18 162:22 163:1 170:19 174:20 201:11 204:19 209:25 210:5,17 Alan 7:11 8:25 162:8,13 166:3 171:17 176:12, 22,24 187:19 188:18 190:8, 10 191:10,14, 25 192:4,11 195:4 allegation 140:17 145:25 allegations 142:13,14 144:6,18 145:7, 19 155:14,17, 20 158:1,3 alleged 143:6 145:7 Allen 7:20 allowed 161:3 altercation 50:6,7,9,16 51:21,25 53:7, 11,19 anus 70:15,21 71:22 72:5 Allen 7:20 allowed 161:3 altercation 50:6,7,9,16 51:21,25 53:7, 11,19	altogether 37:1 America 155:21 American 203:19 amount 37:17 97:24 African 203:19 agencies 25:3, 6,11 27:20 28:8,16 193:15 agency 210:25 agree 126:7,10 ahead 8:13 18:17 23:11 44:18 51:5 53:2,12 64:2 75:7 93:3,14 134:18 162:22 163:1 170:19 174:20 201:11 204:19 209:25 210:5,17 Alan 7:11 8:25 162:8,13 166:3 171:17 176:12, 22,24 187:19 188:18 190:8, 10 191:10,14, 25 192:4,11 195:4 allegation 140:17 145:25 allegations 142:13,14 144:6,18 145:7, 19 155:14,17, 20 158:1,3 alleged 143:6 145:7 Allen 7:20 allowed 161:3 altercation 50:6,7,9,16 51:21,25 53:7, 11,19 anus 70:15,21 71:22 72:5 Allen 7:20 allowed 161:3 altercation 50:6,7,9,16 51:21,25 53:7, 11,19	207:12 anytime 86:9 96:2 209:17 AP1 182:1 AP2 182:1 AP3 182:2 apartment 15:9,12 16:6 92:12 130:7,20, 21 131:12 153:6 168:11 and/or 106:20 Angela 7:21 answering 156:23 158:5 answers 10:15,16 34:24 101:9 Anthony 57:13,15,17,21 58:5 94:6 95:4, 11 anticipate 84:3 142:7 Antonini 7:10, 12 8:1,11,23 10:17 17:18 64:13 73:21 75:22 84:12 88:14 89:19 90:2,11,15 112:17 123:1 127:8 138:19 161:13 173:2 178:5 184:19 188:7 195:20 197:7 198:1,8, 23 201:8,15 211:14 anus 70:15,21 71:22 72:5 78:20 79:1,6,10 110:5 anybody's 72:12 109:20 anymore 46:20,22 121:11 176:23	207:12 anytime 86:9 96:2 209:17 AP1 182:1 AP2 182:1 AP3 182:2 apartments 130:24 apologies 197:22 198:21 apologize 76:7 176:25 appearance 7:15 8:4 appearing 8:6 appears 202:3 application 25:10 44:6 165:22 applied 25:5 28:9 applies 130:6 apply 27:11 28:13 34:12 128:25 applying 27:20,22 28:7
--	--	---	---	--	--

apprehension 114:23	122:14 128:19 129:4 146:12	assignments 54:23 91:11,12, 20 164:24 165:4	authenticated 202:7	background 29:13
approval 66:19 92:24	148:20 150:20 151:17 152:16 154:5,10,14,20	authorized 70:25 194:15	badge 157:22	
approximately 13:10 37:15 41:20 45:8 48:24 49:24 54:6 55:5 186:5	156:12 176:16 191:14	assist 209:2	bag 110:22,24 111:13	
April 26:11 188:14 192:1 194:24 195:3,5	arrestee 120:7 129:14	assistance 201:7 210:25	bags 106:7	
apt 106:12	arresting 103:24 114:12, 21 115:19 116:17 119:11 189:25 191:18	assistant 189:21	Bar 169:13,19, 22 170:1 175:18,22	
area 31:12 120:6 210:11	arrests 81:1 103:16 118:21	associate 63:5	176:5,9 177:1, 4,5 182:24	
areas 32:7 102:1 115:5	123:19 149:20 162:4,20 163:4 195:12	Associate's 213:17,18	183:14,17 184:15 185:4, 12,17	
arm 78:11,13	arrival 116:16	assume 9:13 76:18 110:1 111:9	Barnes 7:3	
armpit 115:4 125:1,6,9,17	ascertain 95:21	Assuming 110:13	based 38:8,14 77:10 96:1 149:1 158:5 190:15 205:6	
armpits 107:18 108:6	ascertaining 183:21	assures 205:20	basic 30:5,7	
arms 78:23	aspect 84:6	attached 45:21 47:23	basically 35:20	
Armstrong 180:16	ass 110:6,15	attend 29:17 30:17	basis 114:8 116:11 148:18, 21 151:7	
arrest 67:22,25 69:1 75:12 77:5 103:2,5 104:9 105:22 115:21 116:11 117:21 118:4,5 119:20 120:15,17,18 121:6,10 123:2, 6,13,22 124:11 131:2,4 141:2 145:19 147:21 148:19 150:22 151:4 153:5 177:1 187:14 188:9,22,23 189:10 208:7 212:20	assaulted 102:19	attended 30:1, 3	bathroom 64:6	
arrested 68:25 100:19 101:18 103:9,17,19 104:22 106:6 113:6,24 114:4, 7,13,22 118:11, 16 120:5	assert 89:16	attending 7:15,16 35:22 43:22	bearing 86:22	
	asserted 89:23	attention 115:4 138:20 185:14	beats 42:14	
	asserting 90:7	attorney 8:3 88:15,22 89:14 90:3 189:21	bed 203:4	
	assigned 31:5, 8,19,24 32:18 41:19,21 43:15, 16,18 44:3,7 45:18,20,22 47:20 54:7,17 55:2,17 56:1,5 58:16 61:24 62:17 87:1 96:18 192:8 193:24 206:22 208:4 209:11, 16,22 212:14, 24	attorney-client 90:8	bedroom 180:24 181:22 182:2 202:24, 25 203:14,20	
	assignment 40:25 41:1 44:1 55:21 91:23	attorneys 12:9,12,17 14:10 16:25 17:23 18:13,14, 22	begin 8:20 77:13 78:1	
		audio 85:11,18 166:8 198:12	beginning 60:14 164:21 197:19 214:3	
			belief 121:16, 22	
			belts 77:14,21 117:8	
			bend 71:21 72:15,20 73:24 74:6,16,21 75:1 78:24 79:4	

80:3,6,8	178:19 185:15	75:4,9 80:13,25 81:18,20,24 82:9,20,23 83:10,19 84:2,9	buttock 73:11 78:19,25 79:1	capacity 176:13 206:14
benefits 33:13, 16	box 178:19,22 179:5,21,22	Brabham 181:5,6,7	buttocks 71:21 72:5,7 74:7 75:2 79:10,16 108:15,17,19, 22 109:20 110:3 111:7	Cappuccilli 40:8,13,14
big 34:21	break 9:18,19, 21 17:12 49:2, 3,5 54:5 63:22 64:6 83:20 88:4 89:17 90:3 98:18 136:15	9:18,19, 21 17:12 49:2, 3,5 54:5 63:22 64:6 83:20 88:4 89:17 90:3 98:18 136:15	buy 156:12 192:7 193:5 195:4	car 173:4 211:17,22,23 212:7,9,10,11, 23
bit 28:22 94:15 100:12 125:22 129:17	briefing 164:21 167:6,12,14,19	98:2,7 99:9,14, 16 101:4 103:21 104:17 105:2,7,12,15 110:11 111:1 112:5,13 115:7, 11 118:2,24 119:1 122:15, 18,22 123:24	buy 156:12 192:7 193:5 195:4	career 28:1,4 45:17 47:3 62:9 81:9 103:15 157:20 213:13
blades 107:18, 19,25 108:11, 12 182:12	Briefly 18:2 57:19	125:4,11 126:2, 8,21,23 127:1, 3,6 128:1 129:16,19 134:18 138:12 140:10 141:9, 12,17 142:6 143:2 144:23 145:1 147:1,23 148:2 149:6 150:3,6,16 151:9 152:6,24 154:11,16 155:1,3 156:15 159:7,21 160:7, 13,17 162:10, 15,22 163:1 168:2 170:19 172:15,20 174:20 175:12 177:24 178:2 181:18 183:19	buy 156:12 192:7 193:5 195:4	carried 116:24
blah 44:25 45:1 132:19	brought 116:5 124:6 132:11 149:3 151:17 171:15,18 185:21 204:9	143:2 144:23 145:1 147:1,23 148:2 149:6 150:3,6,16 151:9 152:6,24 154:11,16 155:1,3 156:15 159:7,21 160:7, 13,17 162:10, 15,22 163:1 168:2 170:19 172:15,20 174:20 175:12 177:24 178:2 181:18 183:19	call 28:23 102:3 118:7 135:25 136:1 138:19 139:17 148:4 149:1 156:23 158:10 172:5 173:12, 25 179:12,16, 18 185:10,14 195:23 196:4	carry 87:1
Blakey 181:3	broke 38:23 51:10,12	172:5 173:12, 25 179:12,16, 18 185:10,14 195:23 196:4	call 28:23 102:3 118:7 135:25 136:1 138:19 139:17 148:4 149:1 156:23 158:10 172:5 173:12, 25 179:12,16, 18 185:10,14 195:23 196:4	cars 91:10,13, 19 172:5 212:13,17,19
block 87:12 96:23 118:13 120:21 121:10 129:5,9 132:14, 21	brought 116:5 124:6 132:11 149:3 151:17 171:15,18 185:21 204:9	173:12,25 179:12,16 18 185:10,14 195:23 196:4	case 7:13 15:3 17:22 62:14 77:19 85:1,2 86:16 95:24 116:4 121:3 134:25 138:22 140:23 141:23 143:1 154:23 155:5 165:15, 17,18 166:20, 21 188:11 189:25 192:8 194:4,6,7,8 208:24 209:11, 22	case 7:13 15:3 17:22 62:14 77:19 85:1,2 86:16 95:24 116:4 121:3 134:25 138:22 140:23 141:23 143:1 154:23 155:5 165:15, 17,18 166:20, 21 188:11 189:25 192:8 194:4,6,7,8 208:24 209:11, 22
Bobby 136:24 164:2 165:18 166:21	brought 116:5 124:6 132:11 149:3 151:17 171:15,18 185:21 204:9	173:12,25 179:12,16 18 185:10,14 195:23 196:4	cases 11:6,14, 23 111:16 140:22 165:7,9, 11,16 190:3	cases 11:6,14, 23 111:16 140:22 165:7,9, 11,16 190:3
body 39:17 69:18,20,22,23 70:5,9,10,12, 19,20,21,25 72:12 77:8 114:22 117:14, 15 120:10 126:1	Bungalow 169:13,19,22 170:1 175:18, 22 176:5,9 177:1,4,5,6 182:24 183:13, 17 184:15	195:23 196:4	calm 105:23	catch 65:25 186:17
bones 51:10, 12	Bushnell 7:24, 25 8:8 10:13 12:19 17:10,13 18:17 19:16 22:9 23:11,16, 21 24:5,9 34:23 40:4,10 42:3	196:15, 20,22,25 198:3, 9 204:19 209:25 210:5, 17 211:8 213:24 214:2, 13,18,24 215:1	cam 15:13 camera 85:17, 22 130:11 168:20	caught 104:12
book 120:15, 17,18,20 121:6, 10 132:14 206:13,14,21, 24 207:3,9,12, 20,24 208:3,8	business 131:13	210:5, 17 211:8 213:24 214:2, 13,18,24 215:1	camera's 85:17	cavities 72:2, 22
booked 186:9	busy 157:6	215:1	Camilo 7:10,11 99:9 150:3	cavity 39:18 69:19,20,22,23 70:5,9,10,12, 18,19,20,21,25
booking 186:13	butt 79:5	215:1	Campo 153:11, 12	71:5 109:22 110:21,25
books 207:25 208:4			Campo's 153:19	111:3,7,13,14, 19 112:4
border 25:12, 14 27:21 28:9 29:6,7				
bottom 77:14 116:3 139:22				

Cayruth 140:7, 8,12,13 141:5, 15 142:12,22 143:16 146:21 147:14,22 148:19,21 149:2,8,10,21 150:8,11 151:8, 17	chest 107:17 108:3 124:25	22:16 37:7 88:20 90:18 101:9 122:25 152:24 153:4 154:19	codes 38:19 coke 109:9 collar 115:4 colleague 62:20 colleagues 18:24 112:3	Compared 33:21 complaint 14:14 51:25 142:5 143:16, 21,22,23 188:9, 12,17,21 189:19 190:6 191:6,8,21,22, 25 192:1,3 195:6,11
Cayruth's 144:5	choose 32:24 71:14	Clark 156:7,9, 10,14	collected 105:24	
cell 87:11,19, 21 96:23 118:10,12,14 120:21 121:10 129:4,9 132:13, 21 133:22 134:4	Christmas 12:22 13:6 17:4,6	class 36:21 43:20,22	college 29:10 30:2,8,9 213:9, 10,13,14	complaints 13:19,21,23,24 14:2,8,16 15:18 34:19 85:24
cellphone 172:10,11,13 173:8,10,20,24 174:23,24 175:5,6	CI 148:3 184:5	classes 30:2 30:24 31:2,3 36:11 37:11	Collier 145:13, 16	158:17,22 159:2,4,23 160:1,5
cellphones 171:24 172:6,8, 9,19 173:6 174:3,6,9,11,18	Circuit 89:5	classrooms 30:25	combating 106:8	completed 40:23 133:13
cents 48:20	circumstance 75:5 80:14 120:2	clear 9:2 12:3,6 20:22 21:16 22:3 52:1	combative 106:20	completely 212:8
ceramic 182:11	circumstance s 66:11 74:11, 13 75:12 119:20	75:21,23 78:18 94:17 99:21 132:18	commander 132:4	completion 133:9
cetera 8:10 75:11	citizen 13:24 14:2,8,16 15:18 34:18 158:16, 17	clearer 73:19	commands 38:24	compliance 106:19
change 47:17 90:18	city 20:4 22:22 29:20 33:11,21 38:22 42:9,11 112:19 140:13 144:10,21 145:13,20 154:22 188:9, 10 197:10 210:7,11,14,21	client 162:8 176:12 196:17	commenced 17:24	computer 178:1
changed 34:1	city's 42:17	close 29:2 40:13 45:25 50:10,11	comment 19:23	concealed 119:12
changing 34:2	civil 11:20,22, 24 141:22	closed 130:23	committed 68:2,3,13 76:6 102:19 103:24 104:19	concealing 68:16 69:11 101:24 102:9
charge 104:8 165:5 194:10	civilian 142:5 143:16,23 152:3 159:2,23, 25 160:5 212:9, 10	clothes 65:21, 22 78:2,3 125:10	communicate 171:23 172:1,4, 6 173:3,18 174:24	concerned 131:6
charges 53:4 77:5 100:18,23 101:18 186:10 190:2,5,7,10	clothing 66:2, 5,18 71:20 72:2,3,11 73:1, 23 77:17,19,22	closer 189:16	communicate d 172:18 175:4	conclude 133:10
chat 200:22	civilian 142:5 143:16,23 152:3 159:2,23, 25 160:5 212:9, 10	clothing's 72:17	communicatio n 90:8,17 175:16	concluded 85:22,25 215:4
cheeks 71:22 73:11 78:19,25 79:1,5,12,16 110:6,15	clarification 73:14 214:23	coach 191:3	communicatio ns 12:5 18:13 88:21 89:17	conclusion 186:8
	clarify 17:19 18:12 19:9	cocaine 147:10,15 182:12	company 26:21,24 27:4	conduct 37:23 64:25 65:12 66:9,19 67:6, 12,16,17,18 68:9,11 69:16 70:1,3,24,25 73:17 75:17

76:10,20,22	conference	84:21 102:12	57:8 60:8 61:14	23 111:4
77:7,16 81:11	7:9	107:20,23	65:23 66:24	coughed 110:8
83:12 84:14	confidential	108:8,9,10	67:2,23 69:1,8,	coughing
88:25 89:5 90:4	147:6,8,11,14,	109:1,2,5,11,	12,13 70:22	78:14
92:3 96:7,20	18,19 148:22,	12,19 110:3,21	71:3,12 72:18	Counsel 7:17
97:16 98:9,21	23 149:2	114:24 116:21	73:2,4,5,6	8:19 15:17
99:6 100:1,5,9,	151:12,16	119:12 121:17,	74:13,20 75:2	23:18 90:17
15,20 101:1,14	152:5,8 161:6	22 131:7	76:11 79:24	Counsel's
103:3,11 104:1,	167:25 177:12	133:13 146:18	80:3,4 85:5	90:12
15 115:25	181:17 183:16,	147:7,8,9 149:4	86:17 89:19,20	counselor
116:19 117:24	22 193:7	contract 28:24	90:14 91:21	43:20
118:3 123:5	195:21 196:14	control 120:2	92:1,19,22	count 61:5,6,9
125:13,19	confirm 182:7,	controlled	95:2,3 96:16,17	82:22 83:11
129:4,14 130:8,	17	192:7	97:6,15 100:3	County 33:11
13,14 131:17,	confiscated	convened 7:9	102:10,25	35:19 37:9
20 132:17,20	212:22	convenient	113:1 114:4,9,	43:19 45:21,23
133:4 135:3	confused	131:17	10 115:21	46:6 51:18
136:12 151:8	130:22 150:21	conversation	116:1,2 118:19,	54:20 56:4
152:25 156:14,	190:13	89:13 158:13	20 120:7,8,11,	59:13,21,22
18 194:13	Connect	177:10	12 121:3,4	188:10 193:16,
211:3	173:8,20 174:6,	conversations	17	couple 36:9,11
conducted	8,11,23	18:21,23 167:1	136:7 137:14	57:19 88:5
55:14 68:25	connecting	convey 132:10	138:4 140:18,	106:6 179:21
74:2 79:20	166:7	Cool 9:25	19 142:14,15,	193:2 195:25
80:10,16,19,23	connection	cop 34:5	23,24 143:19,	courses 30:10
81:16 82:16	144:2	copy 214:7,10,	21 144:18	213:10,12,15
83:2,6 84:18	considered	14	147:4 149:7,25	coursework
86:3,6,8,10,19	100:14,17	cordial 158:8	151:1 162:16,	30:25
87:14,15 90:19,	101:1 119:18	corner 134:12	19 167:20,23	court 7:4,5,12
23 92:18,23	195:21 211:2	Coronavirus	168:25 169:20	8:14,19 65:24
93:6,11,22	constitute	46:24	171:20 172:19	83:23 165:23
94:3,10,17,22	72:11 78:7	Corps 25:17,	173:22 174:1	166:7 186:16
96:3,9 97:13,17	constitutes	20,25 26:13	175:2,22,23	188:10 196:5,
114:23 115:1,	69:22 70:4,12	consult 28:10,14,25	176:3 177:19	11 198:14
14 118:9,18,23	73:17 75:17	contact 29:4 30:4	179:15 180:11	200:2,6,24
119:7,8 120:5,	contagious	213:13	181:3 182:6,8,	201:7 214:6,9,
13 121:2,5,15	47:1	correct 13:4	9,18,19,22	12,20
124:11 129:8	continue 38:6	14:1,15,17,18	183:5 184:16	coworker
130:9 131:8,18,	133:7	19:17 21:11,19,	188:18 194:20	149:13,14
24 132:2,24	continues	20 23:4,7	203:4,20 204:1,	crack 106:7
133:3,15,19,25	85:21	24:15,16 25:16	4,5,12 205:11,	109:6 110:4
134:3 141:5	contraband	28:11,12 32:14	12 206:7,9	147:10,15
149:3 162:24	66:13 68:17	34:14 35:23,24	210:2 212:4	210:10
168:8 180:15	69:12 72:6 76:3	36:13 37:13	correctly	crash 103:2
191:23 193:20	77:12 79:17	39:7 40:21 46:8	21:25 77:24,25	crazy 85:19
203:15 205:8,9		48:10 53:3,9	79:3,22 80:2,8	118:12 157:7
conducting		54:11 56:1,2,23	110:13,14,18,	174:14
39:5,14 76:19,				
24 79:9 80:24				
83:1 96:14				
97:23 98:4				
107:10 130:7				
152:21 161:24				
210:22				

created 179:9	178:25 179:24, 25 180:13 195:3,5,9,10 207:5	defending 8:9 define 64:14 194:8 defined 114:19 definition 65:16,19 66:1 70:5 degree 213:17, 18 delivery 27:5,7 deny 154:13,16 177:3,14,16,18 182:7,17 department 11:11 13:18 19:3,4,14,15,19 20:2,3,11,13, 14,21 21:1,6 22:14,18,23 23:10,14,19 24:14,18,21 25:7 26:15 30:13 31:10 32:18,22,25 33:2 34:5,13 35:5,16,21 36:2,4,7 38:10, 12 41:1 42:8, 10,16 43:17 44:11 45:4,9, 15,21,23 46:5 48:23 54:8,18 58:21 60:21,24 80:20 83:3,7,14 84:13 87:15,16 90:5,20,25 92:14 96:7,16, 19 97:6 98:6 99:7 114:13 116:17 121:10 128:18 129:15 143:22 156:18 158:25 160:9 164:23 173:7, 14,16,21 185:1 186:15,23 193:16,18 206:13,20 208:1 209:19 210:20 211:17, 22,23,25 212:1, 7	department-issued 172:9 departmental 36:4 departments 34:8 48:16 depend 55:11 depending 55:13 74:11,13, 14 80:14 174:15 208:11 depends 49:13 65:5 91:16 depicted 204:4 deposed 10:18 11:1,15,18 140:23 142:17 deposition 7:10,22 8:9 10:21 12:3,9 13:4 14:4 17:21,24 18:22, 24,25 21:12 23:7 89:18,22 93:18 101:8 112:18 113:4, 10,13,17 126:16 127:5, 14,19 138:21 139:9 141:20, 24 144:6 163:16 178:6, 15 188:8 197:8 201:19 202:1 205:17 215:4 depositions 11:3,9 89:1,6 depth 38:25 77:6 106:14 describe 15:7 29:13 70:10 75:25 76:13,20 101:22 117:18 designated 47:25 48:2,5 112:12,17 113:4 116:18 126:15 127:5, 14 138:20	139:8 178:5 188:8 205:17 designating 197:8 designation 48:7,16,17,18, 19 desk 49:21,23 118:1 119:6 132:13,15 135:18 157:5 desks 135:16, 19 destroy 207:17 details 120:14 189:7 detain 65:7 67:14 148:21 151:5 detained 115:25 148:10, 20 149:2,18 150:9,23 151:1, 4 detaining 65:15 detect 117:15 detective 7:10, 11 8:1,11,23 10:17 17:18 42:1 44:5,7,10, 13 45:13 47:18, 20,23 48:1,2,5, 10,13,15 62:11, 13 64:13 73:21 75:22 84:12 88:14 89:18 90:2,11,15 97:21 112:16 123:1 126:16, 21,23 127:8,17, 23 133:3 135:8, 10,14 136:8 138:19 161:13 173:2 178:4 184:19 186:10 188:7 190:1 191:7,9 192:9 194:7,9 195:20 197:7,25 198:8,
D				
D-O-N-N-E-L-L 7:19				
daily 165:2 206:23 210:22	deface 117:1			
damage 117:1	default 131:20, 21,23			
dangerous 116:25	defendant 11:18 18:15 142:11 197:10			
Daniel 56:15, 17,18,19 94:7	defendants 8:1 63:3 139:19 140:2			
data 87:24	defendants' 138:21			
date 30:14 45:5 112:20 152:17, 18,19 174:22				

23 201:8,15 211:14	156:19,25 157:16,19	120:23 121:2,5 126:16 138:23 139:8 178:9	10,17,22 199:23 200:3,5, 9,18 201:5,14 211:5,13 213:20,25 214:4,7,8,10,14	earlier 21:17 22:5 28:17 70:23 79:25 93:17 120:22 121:1 123:16 139:14,15 161:17 164:19 168:14 201:19 208:15
detectives 91:16 135:12	disciplined 156:17	documentatio n 158:21	documentatio ns 144:5	
detention 132:7	disclose 12:4 18:12	documentatio ns 144:5	door 134:12	
determine 100:14	disclosing 147:17	documented 16:21 95:24 96:3 148:15	downstairs 118:12	early 157:3
determined 168:18 169:3	disclosures 138:22	documenting 84:6	drinking 53:19,21	ears 70:14 77:8
determining 76:9 101:1 104:1 119:18, 25	discovered 116:22 119:14	documents 13:12,15 14:19 16:2,18 18:1,2, 3,4 113:9 152:2	drive 87:25 88:2 211:18	easier 131:17
deviation 128:22,23	discoveries 119:22	Donnell 7:18, 19 8:22,25 10:7,9,14 17:12,14,17 22:12 63:21 64:5,12 73:16, 20 75:6,14,20 83:22,24 84:4, 11 88:3,7,13,23 89:11,15,21 90:1,7,10 99:17 112:8,14 115:9,	driver 27:5,7	East 31:15,16 151:22
device 87:5,20, 22,23	discussed 89:3	disk 88:2	driving 173:5	easy 199:4
devoid 75:10	district 7:13	districts 42:18	drop 195:22	educational 29:13
di 158:24	divide 42:6	divided 42:6	Dropbox 200:6	Edwards
dictate 105:8, 17,20 106:17 118:7 130:4 131:16 137:22	dividing 91:12	division 31:6,9 41:23,24,25 42:1,6 44:5,7, 14 45:14 47:20, 23 87:12 96:19 120:20 126:17, 23 127:18,23 133:3 135:8,11, 14 136:8,11 164:13,14 206:22,23 208:4	due 74:16	157:13,17 158:2,8
Diego 29:3,5	divisions 44:10	divisions 183:25 184:6,8, 12 186:16,19,	DUI 103:2,10	effect 118:8 127:24
difference 210:15	divulge 12:4 18:12	divulge 21 187:22 188:2,5 190:17, 22 191:2,4 195:19 196:2,5, 8,19,21,24	DUIS 103:15	effected 162:5
digital 182:13	document 83:14,17 84:14, 15 85:3 97:13 113:1,7,14	document 83:14,17 84:14, 15 85:3 97:13 113:1,7,14	duration 55:21 60:22,23 195:8	effective 112:21
diploma 29:14, 15			duties 194:12	eight-hour 137:24
direct 8:21 133:4 173:7,20 174:5,8,11,23 184:3			duty 25:19,25	eliminate 124:16 126:6
directly 20:16 149:11				else's 210:23
discharge 26:2				emblems 212:12
discharged 27:8				emoji 10:16
disciplinary 35:3 158:24 159:5,8 160:12, 20 161:1				employed 24:17,20 25:2,8 27:6,14,23
discipline				employee 158:22 160:15

encounter 162:8	194:13 204:15 205:11,14 208:13	exposed 74:8 expressed 19:23 20:17	fallen 108:18, 22 false 145:19 familiar 31:13 113:3,7 139:7 extensive 116:4	12,17 189:18 190:6 191:5,8, 21 192:23 female-wise 70:16 females 180:24 181:2, 21 182:1
encountered 104:23 180:19 181:25	evidential 208:12	extend 45:1	extent 16:7 141:19 164:4	field 80:12,17, 23,24 81:5,16 82:8,17 83:13 86:3 92:4,9,10, 13 114:17 124:5 130:19, 23 192:21
end 28:24 194:24 195:2	exact 37:16,17 195:9	extensive 116:4	external 114:22	fault 99:3 favor 77:24 102:23
ended 28:5 31:20 174:18 195:9	examination 8:21 114:22 120:11	extremely 119:21	FBI 23:23	February 45:6 46:1,3 48:24,25 49:4,25 54:9,18 126:18 128:5
enforcement 25:3,6,11 28:1, 4,16 51:20 102:1 210:25	examples 102:5		face 177:8	fight 50:17,18, 19 53:15
ensure 114:20 116:20 124:17 205:22	execute 167:4 173:5 187:12, 17		face-to-face 172:7	figure 177:22
entered 120:14	executed 165:14 204:22		facial 51:7,8,9 70:17	file 158:24 159:5,8,13,15, 20 160:1,6,11, 12,14,15,16,20 189:4 190:2,5, 10
entering 203:9	executing 167:7,10,12,13, 15 203:7		facilitate 116:25	feeling 115:3 125:2,10
entire 45:16 55:16,20 157:20 158:4, 13 192:9	exhibit 112:10, 17,23 113:4,12 126:13,14,15, 19,21 127:5,9, 11,13,14,17 128:20 138:21, 25 139:8		facility 116:6, 15,17,21 117:5 132:7	feet 108:12 Fegan 58:9,11, 15,22,24 60:1,4 61:16,17 62:9, 21 84:19 93:5, 12,23 94:3,8 106:21,23
entry 179:19 180:19 181:25	177:24 178:4,6, 7 185:5 187:23, 25 188:3,8 197:8,10,17 201:9,11,16		facing 172:2	128:11 136:21 164:3 169:2,6,9 170:3 171:1,21 175:16 184:18 186:10 202:22, 23 209:5
equipment 173:23	202:6 203:12 205:17 206:12		factors 76:9	feeling 115:3 125:2,10
escape 116:25	exhibits 177:21		factor 102:6,23	feet 108:12 Fegan 58:9,11, 15,22,24 60:1,4 61:16,17 62:9, 21 84:19 93:5, 12,23 94:3,8 106:21,23
estimate 10:23 13:9 81:15 83:5,8	exists 201:23		factors 76:9	128:11 136:21 164:3 169:2,6,9 170:3 171:1,21 175:16 184:18 186:10 202:22, 23 209:5
et al 7:12	experience 77:11		factor 102:6,23	feeling 115:3 125:2,10
evaluation 132:20	explain 65:8 67:13 100:13 105:19 135:6 189:22 191:11 206:4		factors 76:9	feet 108:12 Fegan 58:9,11, 15,22,24 60:1,4 61:16,17 62:9, 21 84:19 93:5, 12,23 94:3,8 106:21,23
event 128:22, 23 133:2	exposes 75:1		fair 62:8 97:2 101:20 102:21 115:9 118:15 174:17 184:9 209:17	feeling 115:3 125:2,10
events 15:20, 25 16:10,14,20 161:18 205:18	78:25 79:1		fall 78:12,15 110:16,22 111:5	feet 108:12 Fegan 58:9,11, 15,22,24 60:1,4 61:16,17 62:9, 21 84:19 93:5, 12,23 94:3,8 106:21,23
everybody's 41:7			fellow 82:17 104:23 107:1 122:2 123:5 165:16 173:18 174:24 176:8	feeling 115:3 125:2,10
evidence 86:1, 14,15,16 88:1 114:24 116:22 119:12 124:19 171:3,7 182:17			felony 102:20 103:10 104:10 119:20 188:9,	feet 108:12 Fegan 58:9,11, 15,22,24 60:1,4 61:16,17 62:9, 21 84:19 93:5, 12,23 94:3,8 106:21,23

focus 210:3,8, 10	frisked 118:17	Giles 154:22 155:7,15,25	121:24 131:15 204:16 205:5	176:5 177:14, 16,19 180:2 191:7,9 207:18
follow 84:5 90:12 124:22 165:8	front 96:24 97:1 106:12 107:17 108:3 112:22 127:9 157:5 161:3,4 188:7 191:15	give 8:15 13:2, 11 27:17 34:3, 25 35:10 37:16 38:17 44:3 45:6 47:22 49:25 55:4 58:3,6 60:11 64:4 66:17 88:3 101:9 112:15 157:22 160:16 161:2 194:23 196:3	guessing 98:23 99:14	happening 22:24 208:2
force 31:25 32:1,3,18 154:9,13,20 193:12	Fuck 106:9,10	guided 128:17	guidelines 114:14	happy 9:5,11, 19 93:20
forgot 34:17 93:17 156:22 157:9 213:1	full 114:7 118:7,11 124:16 125:13 126:6 199:11 201:12	gun 108:21 124:24,25 125:1,6,9,16	hard 98:13,16, 24 174:13	hard 98:13,16, 24 174:13
form 125:4	Fulton 182:25	guns 108:1,5	Harlem 31:15, 16	Harlem 31:15, 16
formal 28:20, 23 29:7	G	guy 156:5	hats 117:7	hats 117:7
format 9:2	Gallman 144:12,15	guys 36:24 53:15 62:5 8:23 47:25 62:9 101:12 176:6	hazards 114:12	hazards 114:12
forthcoming 106:5,20	gap 180:3	Govan 153:22, 25 154:1,3,14, 20	head 105:21	headquarters 116:16 131:9 132:1 148:11 157:6
Fortunately 197:21	garbage 207:19	government 25:15	headquarters 116:16 131:9 132:1 148:11 157:6	hear 9:3 21:1 49:8 75:14 129:24 135:5 139:2,5 166:5, 6,8,11 173:16
forward 106:3 199:24	garment 64:17,18,24 67:18 77:2,8	Grabbing 117:13	H-O-L-L-E-Y 181:3	hear 9:3 21:1 49:8 75:14 129:24 135:5 139:2,5 166:5, 6,8,11 173:16
found 84:20 85:23 107:24, 25 108:4,14,21 109:1,10,13,16, 19 110:2 125:6, 13 148:12 149:4 171:3 182:17 186:4	garments 117:6,14	graduate 29:16,21	hair 120:11	headquarters 116:16 131:9 132:1 148:11 157:6
frame 27:18 36:9,16 49:25	gave 151:12 160:15,21	graduated 35:18 36:24 38:7,8	half 58:6	hear 9:3 21:1 49:8 75:14 129:24 135:5 139:2,5 166:5, 6,8,11 173:16
free 150:11,18, 20	gears 63:21	graduating 36:21	hand 8:12 79:15 126:15 178:19	headquarters 116:16 131:9 132:1 148:11 157:6
frequency 97:18	gender-wise 70:16	great 113:3 196:25 214:12	handbags 117:8	hear 9:3 21:1 49:8 75:14 129:24 135:5 139:2,5 166:5, 6,8,11 173:16
frequently 98:5 174:12,17 212:17	general 58:16, 19 59:18,20,23, 24 60:2,5,9,13 62:13 73:16 75:12,16	Greenburgh 51:18	handcuffed 115:2 203:3,20	headquarters 116:16 131:9 132:1 148:11 157:6
friend 50:12,17 53:22	generally 22:16 171:22	Gregory 160:18,21	handcuffs 73:25 77:3	Heather 7:19 8:25 17:10 64:3 99:10 129:16 141:9 142:7
friends 50:10 62:20 63:4	generation 34:7	Griffin 59:9,10, 11,13,15	handle 44:24	hearing 19:22 198:12
frisk 114:17,19 115:13 116:1, 22	geographic 31:12	Griffith 59:2	hands 64:19 117:14	Heather 7:19 8:25 17:10 64:3 99:10 129:16 141:9 142:7
	George 29:18, 21	groin 115:5	hanging 62:23	hands 64:19 117:14
	get all 159:22	ground 110:16	happen 177:17,20	held 110:15
		guess 96:1 97:22 99:18,19 101:17 105:19 110:12 113:22	happened 10:3 52:4 58:14 91:3 93:1 124:8 130:16 140:24 148:5 155:8	Helena 157:13
				helpful 22:9
				Henderson 156:7,9,10
				heroin 109:6 210:9

hesitate 34:5	house 36:8 183:8	in-depth 66:16	74:6,9 76:15 77:2,3,9,11,17, 24 78:2,9,15, 19,20 79:8,21	informants 181:17 193:7
hey 160:19	houses 130:24	in-house 37:1 38:12	84:20 85:10,11, 16,22 90:25 91:16 92:18	information 21:4,13 22:1,4 23:4 104:22,24 105:11 107:8
hidden 66:18	hundred 81:23 82:7,11,12	inaudible 155:18	100:16,19,24 101:2,14,18,23 102:18 103:1 104:4,19,20,22, 23 105:4,11,23	120:14 147:5, 13 148:1,3,6, 22,24 151:6,10, 12,15 153:18 166:25 167:2, 18 175:21
hide 77:12	hurt 106:15,16	incident 14:14 16:4,8 49:17 50:2,4,6 51:14 54:1,3 84:24,25	106:2,5,19,25 107:4 110:13, 20 117:21 118:10 122:1 130:2,8 132:14, 20 135:3,5 152:16 190:2,5	176:7 182:24 183:2,7,11 184:14,16 187:10,13,19 188:20 189:1,3, 9,14,15,18,20 190:8,16
hiding 77:10 101:23 102:4,8, 11,12	Hutchins 180:14 185:3	hypothetical 105:10 107:7	I	191:20 203:22
high 29:14,15, 17,18,21			i.e. 77:20	initial 163:22
highest 213:2				initially 41:3, 21 107:6 114:17
hired 27:9,17 33:1 34:14				injured 50:21 51:1,3 78:16
hiring 27:10				injuries 51:4,8, 9 74:15
historical				inquired 69:9
100:18,23 101:17,21 102:2,6,25 104:3,19,21,24 105:11 107:4,8				inquiring 11:4 133:11
history 68:16 76:5 101:23 102:8,12 107:5 127:25 187:15	IDENTIFICATI ON 112:23 126:19 138:25 178:7 187:25 197:17	incidents 18:7 32:5,13		inserted 110:24 111:2, 14
hold 78:11,22 197:21	identified 94:19 109:12 181:2	include 119:19		inside 27:23 107:18 109:23
holding 78:13 87:19,20 118:10,13 133:22 134:4	identify 38:14 101:15 151:19 203:6	includes 117:6		110:4 133:9 134:1,6,8 170:5,23
Holley 181:3	identity 147:17 183:21 184:1, 10	including 140:13		inspect 76:2 78:20 79:6,10, 16 80:7,9
home 130:20, 21 131:12 159:17	II 152:8	increase 47:10,12,13,15, 16,17 48:19		inspection 71:22 72:5 74:8 75:2 110:9,10 111:4
homeless 155:21	III 161:6	independent 15:20,24 161:18 163:12 168:10 170:21 182:4,16		instances 124:20 126:4,9 133:15 134:25
Honorable 180:16	illegal 22:25 109:7 193:5 210:6,13	independently 151:11,14		
Honorably 26:3	imagine 9:17	indirectly 149:12		
hot 32:6	immediately 114:23 115:2 124:12 203:9 204:22 205:3	individual 36:20,23 37:10 41:14 44:12 65:14,21,22 66:12 67:7,14, 19,22 68:13,15, 19 69:4,10 71:4,10,19 72:4,20 73:23		
hour 13:1,2,10 196:19	important 75:11	inform 158:22		
hours 43:14 137:21,22 186:6	imposed 156:19	informant 147:9,14,18,19 149:2 151:10, 16 167:25 177:12 183:16, 22		
		informant's 148:22,24 151:12		

189:24	19:8,10,14		Justice's	knowledge
instructor	20:2,4,5,9,14	J	20:21 23:19	19:6,7,13 51:22
43:22	21:7,23 22:19	jackets	justification	54:2 68:15
	91:17	117:7	65:11 67:5	75:11 76:5
interacting	investigation	jail	69:10 151:7	77:11 105:3
176:12	19:3,6 20:22	January	justified	121:13 122:9
interaction	21:17,18 22:16,	7:8	130:14	153:19 157:15
34:10	20 23:10,20	24:14,21,22	justify	158:1 169:21
interactions	49:16 52:5,8,	26:16 30:14	68:1,3,	181:17 183:14
149:9,20,21	10,12,17,21	34:14 35:9 45:7	14 116:11	184:15,17
157:12,17	53:1 55:14	46:1 48:24		185:12 201:22,
162:7,13,14	59:23 60:3	49:4,15,24,25		24 203:22
163:5	112:2 125:24	54:9,18 112:21		212:21
	144:2 148:10	152:22		
interested	151:2 152:3,4	Jersey	K-O-M-A-N-J-	Komanjo
160:4	165:7 194:11,	26:25	O	141:10,11
internal	17,25	27:1		143:16 144:5
52:5,8,	investigations	jewelry		146:21 147:6,
12 152:3	58:17,19 59:18,	77:14		14,22 148:9
internet	21,24 60:5,9,13	job	Kentuckiana	149:17,21
186:18	62:13 91:15	28:6 47:25	7:5	
	163:4 165:9,11	49:21,23	Kentucky	140:12 141:5
interrogating	investigators	jobs		Krystal
136:13	91:17	213:5	156:3	7:3
interrogation	invitation	join	kill	198:14 200:3
134:16 136:9,	45:1	25:5 45:3	106:9	214:20
10		joined	kind	
interrupt	involved	60:7	13:17	L
38:5	46:19	joint	14:13 30:9	laces
75:8 103:7	51:24 52:3	193:12,13	83:14 97:18	78:5
183:20 186:17	68:18 81:9	Jonathan	103:3,10 108:4,	lag
200:2	121:25 123:12	145:20 146:4,8,	6 109:5 147:8,9	186:18
interrupted	186:13,14	10,11,16	156:19 159:23	lagged
122:21	involves	Jose	160:24 206:3,	199:13
interview	141:1	63:9,15,	17	lagging
23:15 28:20,23	144:17 145:24	17	135:11	200:11
29:7 135:3,25	involving	Joseph	King	LAPD
136:10,11,12	11:4	40:8,	63:7	25:12,14
208:7		14 63:18,19	136:25 145:15	27:21 28:9,19
interviewed	issue	136:24 164:2	156:3,4 164:2	large
23:9,23 24:7	14:14	203:1,2	185:3	104:16
52:11,14	173:7 208:1	Judge	kitchen	largely
interviewing	issued	157:13,	182:14	109:12
134:15,21	112:20	17	202:19,20	law
136:5	126:18 128:5	July	jump	7:25 8:7
interviews	173:20 206:14	155:21	87:25	25:2,5,11 28:1,
24:4	211:17,22	June	122:18,22	4,16 51:20
investigate	item	145:25	195:23 196:3	102:1 210:25
185:4	77:18	146:6,13	knees	lawful
investigated	items	juris	72:21	115:20
50:1,3,5,8	77:17,22	88:24	knew	lawfully
	116:24 132:17	jurisdiction	21:17	116:24
investigating	IV	88:25	22:4,16 23:6	lawsuit
	196:14	Justice	knife	11:7
		19:3,	106:11	15:21 16:1
		14,19 20:2,3,13	124:25 125:1,	18:15 140:14,
		21:6 22:15,18	18	16 141:18
		23:10,14	knives	142:4,12,23
			108:1,5,	144:10,11,17
			8,9,20	

145:3,15,21	listen 44:23	looked 15:17	86:10	meaning 70:24
152:20 155:24	47:1 65:8	44:16 113:9	Manhattan	76:24 186:25
156:2 161:15	105:24 106:1,3	128:20 139:11	31:23,24 32:1,	187:3 194:10
205:24	158:12	163:15 203:11	2,3,6,18	208:23
lawsuits 11:4	listened 22:17	loosen 110:14	manner 89:6	means 18:6
139:18,25	23:3 161:23	lot 34:10 48:16	119:13	190:7 194:9
140:1,3	listing 139:25	81:10 93:21	manual 114:3	mechanism
lawyers 12:6	litigation	Louisville 7:7	128:18	87:13
lead 208:24	112:19	lunch 136:15	Manzione	media 19:24
leadership	living 182:1	M	39:24,25 40:1,	20:15
213:15	located 7:6	M-A-N-Z-I-O-	2,3,17	medical 80:1
learn 22:6	26:22,25 29:19	N-E 40:4	111:20,23	meet 12:9,11
learned 22:6,	148:10 181:21	M-C-E-A-C-H-	17:23 155:9	10,17
10,17	182:25 203:14	I-N 58:1	164:23	164:23
learning 21:13	location 7:16	M-E-C-Q 57:25	meeting 12:16,	22:1,3 53:1
22:1,3 53:1	92:13 130:6,9	made 20:12,13,	24 13:3,9,13	176:4
176:4	131:18,21,22,	20 21:5,21	14:3,9,24 15:16	
leave 33:3,10	23 133:16	25:10 110:19	16:24,25 17:1	58:15 60:12
58:15 60:12	148:9,14	118:22 124:11	167:10 196:7	143:11 184:11
143:11 184:11	149:17 151:19,	141:2 158:2,23	meetings	
leaving 18:20	21 192:10	179:12,18,19	12:14 18:14	
left 26:13	locations	195:12 211:2	member 45:11	169:16 178:19
169:16 178:19	130:24	Main 7:6	116:18 120:5	
leg 74:15	lock 117:25	maintenance	129:3 133:4,5	
length 60:20	lockers 135:16	124:17	members	
lessee 186:5	lodged 155:15	major 32:5	128:17 164:6	
letting 186:20	log 196:6	62:14	memo 206:13,	
level 44:25	206:24	majority 93:15	14,21,24 207:3,	
Lewis 7:19	long 12:16,24	make 9:2 20:18	9,12,20,23,24	
license 212:6,8	13:10 25:19	42:15 44:6	208:3,8	
lieutenant	26:10 27:6,12,	73:19 75:21	matter 7:11,20	
39:24 40:17	13,14 28:2	78:11 89:24	9:1 18:25	
56:7,10 160:18,	30:20 32:17	102:3 118:4	21:18,22 22:14	20 161:4 164:3,
20 161:4 164:3,	36:5 39:23	147:12 166:5	37:18 38:15	11
11	40:19 41:5,16	168:1 174:14	107:20 125:19	
life 25:9 116:25	43:16 45:13	190:25 207:11	128:14	
limited 16:1,10	49:18 53:17	208:7	matters 20:21	138:22
138:22	54:13 56:18	makes 140:16	maximize	
lines 84:22	57:17 58:5,10	210:24	114:11	
link 200:6	59:24 60:15,18,	making 21:4	171:17 175:24	
list 140:2	19 61:1 84:2	180:19 181:25	176:11 183:6	
listed 140:3,6	95:8 99:22	malfunction	mentality	164:5 203:15
164:5 203:15	137:24 140:25	86:23	34:11	
longer 26:12	145:20 146:4,8,	mandatory	mention	
	10,11,16,19		156:22 157:9	
	171:10,12		mentioned	
	192:22,25		27:20 28:8 85:2	

118:6	modified 49:7, 10,12,14,18,19	21 145:14,20 148:11 154:22	47:14,19 54:8, 17,24,25 55:2, 3,7,17,25 56:4, 8,14,25 57:10, 18 58:11,15,19	northern 32:6
mentions 106:25	52:16,23 54:5, 14,22 57:1,6	156:18 158:18, 25 184:25	59:15 60:5,12 61:17,25 62:2, 6,17 82:17	nostrils 70:14, 20
met 8:24 155:10	95:2 157:4,17	188:10 210:7, 14,21	86:25 87:1,8, 16,18,21,23	note 206:23 208:10
metal 77:14	modify 90:18 93:19	Mountain 40:24 98:6	91:5,18,23,25 97:9,17,20,24	notation 139:3
method 169:4	moment 198:16	mouth 70:13, 20 71:5,6,8,10, 14 77:8 107:19	98:5 103:18,19, 23,25 104:6,7,9	note 155:4 206:16 207:2 208:8
methodical 114:22	Monday 17:5	108:11 109:17	109:10,13	notes 206:16, 17 207:3,25 208:12,13 211:6
methods 119:14	month 13:7 123:7	mouths 109:14	117:24 118:16, 22 128:7 131:5	notice 44:12
mic 189:16	months 30:21, 24,25 31:3 34:15 35:23	move 34:17 60:4 199:24	133:21 134:2,7 135:7,13,15,23	noting 81:20
Michael 155:1, 2,7	41:8,10,21	moved 47:14	136:4,19 137:4, 20 138:2	November 16:10,15 18:7
midnight 43:6, 8,9	43:18,20,24,25 44:3 47:22	MP 212:7	148:11,13	136:16,20
Miguel 53:13, 22	54:6,7 57:19	multiple 50:24	153:15 156:12	149:9,21
miles 42:19	62:12,16 193:2 194:22 208:16	91:10,13,19	163:22 164:6, 12,20 168:11	161:15,25
military 27:8, 23 28:1	morning 7:3, 18,24 8:23 17:24 18:1,3	99:10 122:14	171:23 172:18	162:4,9,14,18, 21,25 163:6,10, 17 164:6
mind 68:6 75:17 101:5	Mount 11:5,11, 21 19:4,15	124:2 147:20	173:4,17	165:12,15
mine 50:10 65:9	20:4,10,14 21:1 22:22 23:24	municipal 212:8	180:13 186:4	167:5,20 168:5
mine's 200:10	24:10,14 25:3,7	municipality 61:13	191:22,24	169:17,19
minimize 114:12	33:1,3,9,21	muscle 110:14	193:6 194:3	172:14,17
minute 63:22 112:15 138:11 166:10 172:24 202:4	34:12 35:7,8, 11,16 36:1,6 37:2,3,12,14, 19,23 38:2,9, 10,11,16,22 39:2,3,4,13,17 41:1,16,23	MV 188:11	206:14,25	174:22 175:7
minutes 64:5 88:5 211:7	42:6,9,16,22,25 43:4,5,16 44:2 45:4,9,14 46:5, 10 48:9,14,23 51:13,15,24 53:7 54:3,8,17	MV5 44:14	208:6,8 209:2, 4,9 210:7,13,16	176:6,13 177:7
Misdemeanor 104:10	60:24,25 61:2, 5,8 74:3 80:20	MVPD 186:9	211:3,17 212:2, 14	178:24 179:25
misheard 25:24	81:16 83:2,6,13 84:13 90:5,19, 24 92:14 95:22 96:19 97:6	N	narrative 181:13 186:1	181:13 186:1
missed 59:20	98:15 100:6,10 112:20 140:13	Nakia 181:5	187:12 191:7	187:12 191:7
mistakes 190:19	143:22 144:10,	name's 8:25	193:20 201:23	193:20 201:23
Mitchell 57:13, 15,18 94:6 95:4		named 8:1 11:18 18:15	nature 22:25 119:19	205:18 207:4, 13 212:24
		names 11:13 209:16,21		number 7:13
		Nancy 180:17		36:24 42:23
		narcotic 45:2 48:23 112:3		55:4 81:4,8,15
		134:8 209:23		95:8,17,20
		narcotics 44:5,7,10,14		97:10 112:18
		45:3,11,14		116:15 128:18
				132:23 145:13
				156:22 157:10, 23 158:6,11,14
				159:1 172:13, 16 175:5,6,7
				188:11 209:10
				numbers 173:25 206:18

Numerous 209:10,13	195:14 204:19 209:25 210:5, 17	offered 28:19 office 24:2,8 36:6 69:11 objections 8:10 objects 77:15 115:3 117:15	209:6,9,12,22, 23 210:16,20 211:17 officer's 40:15 165:16 178:18 officers 18:15 32:13 33:9 37:8 obligation 207:1	209:6,9,12,22, 23 210:16,20 211:17 operated 55:18 194:21 operates 91:18 operating 15:13 137:9,11, 20 138:3 168:15 169:8 202:7 operation 156:11 191:23 192:9,14,15,22, 24,25 193:1,4, 8,12,13,22,25 194:5,6,9,10, 16,25 195:2,7, 13,17 208:14, 17 209:3,6,18 210:16,24 211:3
NYPD 24:18 25:3 27:9,11 28:7,13 30:22 33:3,19 34:3 35:23 36:23 37:10 41:12 61:6 96:8,12 98:14,20		observe 111:11 131:3	officer 11:5,21 23:24 24:11,13 31:6,9 34:7,20 35:5,12,16 38:8 41:3 43:16 44:12 46:5 47:21 56:11,13, 25 57:10,18 58:11 61:2 62:2,11 63:4 70:24 74:3 75:11 76:1,14 78:8 81:16 91:6,23,24 92:24 93:12 94:1 95:23 96:15 97:5,9, 12,23,25 98:20 99:7 100:2,14 102:9 103:23 112:3 114:12, 21 115:14,20, 25 116:17 117:24 119:6, 11 128:7 132:13 133:9, 10,12 153:11, 12,19 158:19 167:1,25 168:24 169:25 173:17 175:17, 25 178:18 180:9,12,14 181:16 182:8, 10,23 183:3,4, 10,17 184:13, 22,23 185:2,11 189:4,11,25 191:18,24 192:5,10,12 193:24 194:4 202:20,21,23 204:6 205:1 206:15,25 208:6,9,24,25	offices 135:16 official 83:14 officially 214:17,21 215:2 Oka 104:21 on-the-job 100:9 one-page 126:16 ongoing 141:18 142:12 155:4 165:7 online 7:3 open 71:10,14 92:11 109:17 130:25 135:4, 18,19 oper 126:23 operate 55:7 137:4 168:19
NYPD's 31:14		occasions 92:2 121:20 122:5	order 33:1,11 44:15 64:22 65:12 66:9 67:16,18,25 68:11 69:16 132:14 173:15 190:2,9 210:23 original 121:23 other's 173:24 outcome 52:7, 9,20,22 53:1 outer 64:17,18, 24 67:17 77:2,8 117:6	
O		occurred 16:20 122:12 143:7 167:19 208:15		
oath 89:2,7		Occurrence 180:1		
object 141:25		October 26:11 191:14 192:17		
objection 18:17 19:16 23:11,16,21 51:5,11 53:2, 12,16,20 58:20 60:17 61:3 65:18 66:10 67:8 68:5 69:2 70:2,7 71:2,7 73:13 74:4 75:4,14 80:13, 25 81:18,21,24 82:9,20,23 83:10 88:19 90:6,21 91:8 92:20 93:2,14 94:12 95:25 97:19 98:2,7 101:4 103:21 104:17 105:2,7, 12,15 110:11 111:1 112:5 118:2,24 119:1 123:24 125:4, 11 126:2,8 128:1 134:18 143:2 147:23 148:2 149:6 150:16 151:9 154:11 156:15 159:7,21 160:7, 13,17 162:10, 15,22 163:1 168:2 170:19 172:15,20 174:20 181:18 187:5 189:12	off-duty 50:7 54:3 offense 68:13 103:18,19,25 104:6,7 105:6, 13			

outlets 19:24 20:15	111:6,14	pay 33:7,9,13, 16,18,25 34:9 47:11,12,13,15, 16 48:19	21 120:6 129:4 131:7 149:5 158:7 184:1	87:15 91:1 92:19 173:19 194:19
overcoats 117:7	123:23		person's 126:1	pick 196:17
overseas 26:4	participating 8:2	paycheck 46:9 48:20	personal 104:8 114:20 159:1,5 172:11 173:11,24 174:3,24 175:6 211:23	piece 204:15 pieces 208:10
P	particulars 142:18,21 146:23 147:3	PCP 109:9 210:9	personally 149:20	place 50:2,4 92:14 101:25 130:11 151:20 180:4 195:4
p.m. 138:14,17 161:8,11 166:14,17 191:15 192:17 197:2,5 198:20 201:1,4 211:10, 12 215:3,4	pass 47:23	PD 37:2,3	personnel 160:8,9,14 161:1	places 47:5
pages 207:22	past 147:19	Pedro 59:2,3,4, 12,14	persons 113:6, 24 114:4 116:20 128:19 132:3	Plains 8:2,7
paid 33:17	pat 64:15,17,18 65:9 67:17 77:1 115:13 131:6	pending 7:12 9:20 77:5 88:22	pertain 157:12	plaintiff 7:20 166:3 171:17 172:21 183:24
pair 77:19,20 78:5	pat-down 37:23 64:14,21, 25 65:2,10,12 66:15	pension 61:7	pertained 155:20	plaintiff's 7:17
Palmer 180:15 184:19,23,25	patience 199:5	pensions 61:12	pertaining 15:3,25 90:4 144:5 157:2 166:20 187:14	plaintiffs 11:14
pants 71:20 78:5	Patrick 63:7 136:24 164:2	percent 118:25	pertains 142:4, 12	plan 60:15,18, 19 61:2
paper 26:21 208:10	patrol 25:12,14 27:21 28:9 29:6,7 31:6,9 32:10,11,13 35:16 41:2,20, 21,22,24,25	percentage 118:21	plans 60:20	
paragraph 124:9 139:23 185:15	42:5 43:1,4,16, 18 44:3,25 47:14,19,21 61:20,21 87:11, 12 96:19,20,22, 25 97:5,9,12, 18,21,23 98:4	performed 95:14,22,23 111:20 114:20	plastic 110:22, 24 111:13	
parameters 132:24	42:5 43:1,4,16, 18 44:3,25 47:14,19,21 61:20,21 87:11, 12 96:19,20,22, 25 97:5,9,12, 18,21,23 98:4	period 27:10, 19 31:17,20 35:17 41:4,5,8, 9 47:22,24 95:9 147:21 208:15	plate 182:11 212:6,8	
pardon 64:1	Perkins 7:21	Perkins 7:21	play 177:23 197:7,11 199:10 200:4	
part 19:9 31:1 44:13 45:1 46:16 49:8 73:18,22 75:18 80:24 83:1 85:8,9,19 123:4 136:20,22 142:22 153:17 156:10 164:12, 13 165:15 184:13 185:7 190:17 192:13, 14,15,23 193:21 195:12 205:11 212:20	47:14,19,21 61:20,21 87:11, 12 96:19,20,22, 25 97:5,9,12, 18,21,23 98:4	47:14,19,21 61:20,21 87:11, 12 96:19,20,22, 25 97:5,9,12, 18,21,23 98:4	playing 197:20 199:25	
partially 110:21,24	patted 118:17	permitted 71:12 76:1,14 77:18 78:3,8,18	PLAYS 199:11, 20 200:15 201:12	
	pattern 19:20 20:9,25 22:24 23:2	person 12:14 16:25 18:20 50:23,24,25 51:2,3,4 52:11 76:4 78:14 107:11 109:2 114:7,13,23 115:15,24,25	PO 184:19 185:3	
	patterns 19:13 20:1 21:5 22:24	pause 198:6 200:19	pocket 101:25	
	patting 64:23	pausing 199:23	pockets 64:18, 24 66:18 77:15 117:10	
			point 47:2 169:14 176:4,7 177:7 190:13 203:18	

police 11:5,11, 21 14:12,13 15:18 16:12,15 18:6 19:4,15 20:10,14 21:1 22:22 23:24 24:11,14,18,21 25:6,7 26:15 30:13,17 31:9 32:17,22,25 33:2,9,17 34:7, 13,20 35:4,12, 16,19,21 36:2, 6,7,17 37:8,9 38:8,9,10,11 41:1 42:8,10, 16,17,20 43:17, 20,22 45:4,9, 15,21,23 46:5 48:16,23 51:13 52:3 54:8,18 61:2 62:11 67:19 69:3,4 70:24 74:3 76:14 77:4 80:20 81:16 83:2,6,13,15,18 84:13 90:5,20, 24 92:14 95:23 96:3,6,15,16,19 97:6,13 98:6,14 99:7 100:2 116:6,15,16 117:5 120:23 121:3 143:22 149:3 156:18 157:5,20 158:18,25 159:18 161:19 164:9 176:15 180:14 184:22, 23 186:15,23 193:16,17 203:12 212:6, 11	24 133:18 portable 87:2 portion 37:14, 15 62:9 142:11 147:11 152:8 161:6 196:14 position 27:3 32:15 positions 28:19 possess 147:6 possessed 212:20 possession 84:21 85:15 104:8,10,11,14 147:15 148:13 possibly 13:18 18:18 25:18 57:19 82:12 103:12 149:12 213:17 post-high 30:1 post-search 170:15 practice 19:20 20:9,25 23:2 39:14 124:22 205:6 practices 19:5, 13 20:2 21:6 36:1 38:2 39:5, 17 Practicing 22:21 pre 153:4 pre-search 170:14 Precinct 31:11,13,21,22 42:5 precincts 31:14 42:4,6 prefaced 107:7	preparation 17:21 178:15 prepare 12:2, 9,12,17 14:3 16:25 18:22 113:10,13 127:14,19 144:6 202:1 prepared 189:2 preparing 13:4 113:17 presence 84:19 122:2 183:23 present 7:22 15:10,11 18:16 66:21 67:1 68:11 69:6 82:16,18 91:1 92:5,9,19 93:5, 23 94:2,9,13,19 115:24 119:6 120:7 122:8 133:4 153:4,7 164:16 166:4 169:9 170:22 171:10,14 173:19 176:18, 21,25 180:21 185:8 presented 16:3 18:4 pretty 16:13 27:9 28:5 32:4 37:20 38:3,18 45:16 78:6 93:9 102:7 130:5 132:19 190:11 previous 119:14,22 previously 11:15 94:19 112:10,12,17 126:15 127:4 138:20 158:7 178:5 188:8 primarily 114:20	128:18,25 130:12 132:25 133:14 procedures 37:21 39:1 113:5 114:3 126:17 127:18 128:14 136:12 proceed 89:22 105:3 proceeded 148:6 PROCEEDING S 7:1 proceeds 101:8 process 28:2 76:19 78:1 106:16 132:1 processed 117:23 118:13 132:15 processing 118:1 132:11 produced 112:19 138:22 197:9 professional 111:20,23 promoted 59:16 promotion 47:6,8 48:5,6 62:6 proper 115:16 properly 119:8 property 117:1 Prospect 151:22 prove 206:6 proves 206:3 provide 172:20 211:1 provided 39:21 144:1
--	--	---	---

151:16 167:18 183:2,7 184:15 187:13,18 189:20 190:8	putting 44:21, 22 132:7 172:21	Quinoy 63:9 164:3,4,11,16 169:23,25 175:17 176:1 180:14 185:2 205:1	reasons 77:22 80:2	recognize 127:11 178:17, 21 188:11 199:17
providing 76:8 210:20	Q		reassigned 44:4,9,21 46:2 47:6 58:18 59:18 62:12	recollection 15:20,25 16:7, 19 39:13 113:19,21 141:15 143:6,8
public 147:13	qualifying 126:11		reassignment 47:9	
Puff 63:4 136:24 145:15 164:2 167:1,25 169:23 170:1 175:17,25 180:9,12 182:8, 10,23 183:3,5, 10,17 184:13 185:2,11 189:4, 11 191:7,9 193:24 203:13 204:6,7 205:1	quantities 104:16	radio 38:19,23 157:8 158:9 171:24 173:14 179:12,16,18	recall 10:22 11:19,24 13:4 14:2 17:2 18:18 26:12 37:18 39:6,7 40:6	146:1 155:22 161:18 162:1,2 170:21 171:6 180:20 182:5, 16 185:20,25 205:18 208:17
Puff's 165:18 166:21 178:18 181:17 183:3		raise 8:12	rank 47:18 213:2	recommendati ons 195:16
purchased 191:24 192:10			rational 114:8 96:8 111:17 139:14 146:20, 22 148:17	record 7:2 8:24 17:14,15 63:23 64:7,8,9,11
Purnell 7:4		razor 107:18, 19,24 108:11, 12 182:12	rarely 173:14 149:15 150:1,2, 3,4,10 157:1	85:10,11,12 86:11,20 88:4, 7,8,10,11
purpose 33:10 64:21 110:12 113:25 193:4		reached 47:2	reaction 110:14	89:13,24 115:7 133:6 138:10, 13,15,17 141:9
purposes 8:8 9:24 23:19 89:15,24 142:10	question's 94:15	read 16:15 159:25 160:22 163:14 183:3 190:14	read 16:15 159:25 160:22 163:14 183:3 190:14	161:8,9,10 166:1,3,10,12, 14,15,17
pursuant 67:21 90:16 130:19 131:11 171:7 195:21 205:10	questions 9:4, 10,20 12:2 40:19 75:15,16, 21 84:7 89:25 93:21 99:22 101:9 143:12 166:20 190:23 195:20,25 197:12 201:10 211:15	reading 113:12 160:4 181:24 190:15	reading 113:12 160:4 181:24 190:15	170:11 172:22 175:10 187:14 197:1,3,4 198:16,17,19, 20 200:13,21, 25 201:2,3
push 202:11		ready 61:4 196:13	received 99:25 100:6 147:5,13 148:7 151:6	202:11 211:10, 11,12 214:5,7, 19 215:3
put 8:4 46:12 49:20 78:2 81:4,22 84:23 86:1,16 95:8 97:10 117:23 118:13 126:13 152:4 160:23, 25 182:8 184:10 196:5,9 200:22 206:21		real 17:13 45:20,22 46:13 47:7 54:10,20 60:16 183:20	receive 98:19 147:25 195:16	record's 94:16
puts 44:11		rear 115:2	received 99:25 100:6 147:5,13 148:7 151:6	recorded 84:20 85:3,7,8, 9 86:4,7 96:24 170:16 204:22
		reason 9:3 33:8 48:12 65:7 67:20 86:20 169:1 173:24 200:12	receiving 100:8 128:4 175:21 176:7 183:10	recorder 15:14 87:2,8 202:8
		reasonable 115:15 121:16	recently 54:19	recording 16:6 86:23 87:5,9, 13,20,22,23
		quietly 134:24	recitation 115:8	133:7,10,11 161:23 168:15
		Quinn 7:25 8:7	reclarify 122:23	170:10,13 197:9 202:11
		reasonable ss 120:1		

records 159:1 208:5	relying 183:17	removing 72:11 117:13	145:18,24	32:5
recovered 133:14	remained 184:19	repeat 14:6	representation 20:20 21:21	response 136:18
REDACTED 147:11 152:8 161:6 196:14	remember 11:13 14:8 16:5 27:12 28:18,22 29:8 30:11 34:15 36:8,16, 24 37:16,22,24 38:20 39:10,11, 15,19,20 40:1, 17 41:5,15 44:19,22 45:5 52:3,14,19,20, 25 53:14,21 93:22 96:14 99:4,11,12,20, 23,24,25 100:7, 8,11 112:11 127:20,21,23 128:3 136:19, 22 141:4,6,16 142:17,18,21 143:15,18 144:1 146:23, 25 147:1 151:24 152:19 153:10 155:10 156:16 160:11 162:11,12,17, 23 163:2,24	20:6 26:18 54:12 56:16 65:1 68:23 120:25 129:19 131:19,25 151:13 177:15 183:18	representing 7:5	responsibilitie s 168:21,22 194:12
redressed 78:2	repeating 68:6	181:25	reprimand 156:24 157:2, 11,22,25	responsible 119:7
refer 209:19	rephrase 122:17		reputation 119:21	rest 147:12
referring 13:22 22:11 41:11	replaced 58:22		request 9:19	restate 9:6
refers 180:5	report 16:4	44:15,18,19,21, 23 46:12 60:25	44:15,18,19,21, 23 46:12 60:25	retained 23:18
reflect 166:3	18:6 22:11,18 83:15,18 84:17, 24,25 85:1,2 95:24 96:4 97:13 120:23 121:3 161:19 178:10 179:2,5, 6,8,10,25	66:14 74:21 76:15 159:11 160:23,24,25	66:14 74:21 76:15 159:11 160:23,24,25	retire 61:4
reframe 9:11	requested 76:18 109:16 111:18 159:10		requested 76:18 109:16 111:18 159:10	retired 39:23 40:7
refresh 16:19 143:5,8 146:1 155:22 180:20 185:20 205:17	requesting 214:13		requested 76:18 109:16 111:18 159:10	returned 205:1
refreshed 16:11 93:18 185:24 208:16	required 85:6	128:24	requesting 214:13	returning 176:1
refresher 36:3, 6 40:23	requirement 86:2		review 12:1	review 12:1
regard 24:9,10	report's 179:9		15:4 144:4	15:4 144:4
regular 103:4 172:10 211:3 212:11 214:8	reported 54:3	67:3	161:3	161:3
regularly 212:14	reporter 7:5	67:3	reviewed 14:3, 9,12,16,19,24 16:12 18:2 161:19 163:15 178:14 201:19	reviewing 16:19 113:12
related 11:8, 10,21 14:13 21:23 38:3,9,11 39:2 143:17 213:15	16:4 165:11 170:23 171:3, 12,16 175:3 176:7 188:21, 25 189:1,7,13 191:19 192:24 195:9 203:16 206:18 209:16, 21 210:3 211:16 212:15, 16,23 213:9	18:14,19 65:24 83:23 165:23 166:7 186:16 196:5,11 198:14 200:2,6, 24 201:7 214:6, 9,12,20	reserve 213:22,25	revised 190:18
relates 190:14	Reporters 7:6		residue 182:12,13	rewards 195:16
relation 135:1	reminding 184:8		resign 32:24	Riddenhour 181:8,9
relationship 50:12	removal 117:6		resignation 32:20	Robert 63:3
release 124:12	remove 65:22		resigned 32:21	role 194:5
released 148:13 149:5	72:1 77:14,16, 22 116:21		resort 173:11	roles 213:6
reliably 174:19	removed 71:20 72:17		respect 39:5, 14,16 90:19	rolling 85:18
relied 168:1	73:1 77:23		respond 38:23	romantic 50:12
	117:1 132:18		51:13,20 132:13 190:1	room 8:3 87:18
			responded 185:3	133:5,8 134:1, 4,6,11,13,16
			responding	135:4 136:1,4, 13 157:8 158:9
				165:24 179:13,

18 182:1 196:6, 9,12	screaming 106:8	116:4,6,12,14, 19 117:5,12,18, 24 118:8,9,12, 197:11,16 screen 9:25 136:10,11	21:23 22:25 23:3 37:23 39:5,14,18 64:25 65:2 80:11,17,19,23	sectors 38:23 secure 73:25 77:2 120:6 194:13
rotated 137:10	Sea 58:10	120:1,4,13,23	81:15 82:15	secured 205:13
roughly 30:21 36:25 42:24	seal 183:23 184:2,10	121:6,15,23 123:5,12,13 124:10,15,18, 23 125:13,19	83:1,2,6 84:7 85:6 87:14 90:4,19 92:8,15 93:6,10,15,21	security 114:11 124:18
routine 65:10 66:16 165:2	seamless 202:10	126:6,7,17,24 127:18 128:15, 19,24 129:4,14 130:5,7,9,14,20	94:14,18,20,21 95:5,14,22 96:7,10,14,21, 22,25 97:1,5, 16,24 98:5,21	seek 67:6
rules 116:6	seams 66:16, 17	131:8,11,12,14, 17,23 132:2,7, 17 133:3,5,10, 12,15 140:17	99:6 100:1,5,10 114:17 118:3 119:22 129:8 132:24 133:19,	selling 104:12 192:4 193:6 210:6
run 30:22 37:3 79:15	Sean 58:9,11 60:4 61:16,17 62:20 84:19 128:10	141:1,4,6,15 142:13,21 143:6,17	142:13:3,14 144:18 146:19 162:24 187:19	send 200:6
Rutherford 144:10,11,14	search 15:9,19 64:14,21 65:12, 17,19 66:1,4,9, 14,20,22,23	145:10,11,12, 25 149:4,8 150:14 151:8, 18,23 152:22, 25 153:6,7,19	143:6,17 144:18 146:19 162:24 187:19	sending 200:19
		156:14 161:24 162:5 163:4,22	146:4,22 177:3	sentiment 34:7
		165:14,22		separate 123:18 135:9, 13,22 136:9 172:5
		166:22 167:2,4, 6,7,13,14		sergeant 56:10,15 57:13, 14,17,21 58:5,
		168:1,8 171:7 173:5 176:18, 21 179:14		9,10,14,22,23 59:12,16 62:3, 6,9 63:9 84:19
		180:6,15 182:11,17		91:5 93:5,12,23 94:3,6,7,25
		186:8 187:13, 17 191:10		95:4,11,13 118:1 128:10
		193:20 203:7, 14 204:23		135:19 136:21
		205:4,7,8,9,10 207:5		164:3,4,11,16 165:4 169:2,6, 9,23,25 170:3
		search' 119:19		171:1,21 175:16,17
		search,' 117:6 124:17		176:1 178:21 180:14 184:18
		searched		185:2 186:10 202:22,23
		118:18 168:12 170:17,18		205:1 209:5 213:4,6
		207:8		sergeant's 135:20
		searchers 69:20		sergeants 58:23
		searches 19:21 20:10,25		serve 26:6 45:13 214:14

served 61:6 139:19	shelter 155:22 shield 156:22 157:10 158:6,11,14	195:6,11 214:15 significance 16:5 single 93:9 118:4,5 121:20 123:2,6,22,25	108:15 125:3,24 SOP 127:1 sort 32:4 43:21 65:11 70:20 103:25 209:18	159:3 169:11 189:13 190:7
service 61:7 211:2	shift 43:7,9,11,13 55:8,9,10,18,19,22,23	16:5 137:21,24 162:3 163:6 164:19,21 212:24	127:1 103:25 209:18 sought 23:14 111:19 112:3	160:5 speculate 99:19 speculating 34:6
services 42:1 210:19,23	shifts 43:1,2,4 137:18 211:18	38:13 40:6 53:6 81:14 141:14 142:16 146:3 163:8 167:17,24	15:23 19:12 32:12 48:22 76:8 86:18 101:12 173:17	40:10,12 59:5
set 132:25	shirt 78:5	175:25 176:11	sound 35:9 48:25 118:8	59:5
setting 130:25	shoe 78:5	sitting 157:5 203:3	sounded 22:13 sounds 28:8 32:12 48:22 76:8 86:18 101:12 173:17	59:5
Seventh 89:5	shoelaces 77:18 78:4	157:5 203:3	source 147:6	59:5
severity 76:5 100:18,23 101:17 102:16,22 103:10 104:3,5,18 105:5,13 118:6	shoes 77:17 78:4 117:8	situation 49:13 65:5,6 100:25 104:9 105:8,17,20	South 161:24 163:9,17,22 167:5,19	spent 97:20
Seward 7:11,20 8:25 162:8,13,21,25 163:6 165:23 166:2,4,11 171:15,18 176:12,19,24,25 177:4,7,11 182:20,24 184:11,14 185:16,21,25 186:9,14,22 187:11,19 188:18 190:8,10 191:25 192:4,11 195:4,19,24,25 196:9,10 204:9,18 205:2	short 41:4 63:22 95:9 136:15	106:17 112:1 130:3,4 131:16	171:10,18 176:19 180:6,16 182:25 185:17,21 187:18 191:15 193:21 199:21	spoken 54:1
Seward's 14:14 16:1 161:15 177:1 187:14 191:10	shorter 35:17	situations 189:25	southern 7:13 24:1,8 89:4	spread 71:21 72:4 73:10 78:19,25 79:5,9,12
sex 115:14,20,24 116:18 120:5	shortly 136:15	six-month 41:9	space 131:21	square 42:19
Shania 181:8,9,10	show 112:11 152:2 159:14 165:1 170:14	six-page 138:23	speak 68:7	squat 72:25 73:24 74:16,19 75:1 77:24,25 78:23 79:3,22 80:2 110:13,17,23 111:4
share 197:11 198:24	showed 164:25	sliding 117:14	speaking 8:10 70:15	squatted 110:8
shared 168:21,22	shy 24:24	small 134:11	special 32:9,11 84:24 115:4 194:5	squatting 78:14,23
Shawn 60:1	sic 102:2 132:23 140:12 181:8	sneakers 78:4	specific 17:2 36:8 37:24	squeezing 117:14
Sheila 181:3	side 31:22,23	social 62:20 63:4	socks 77:17,20 78:5 107:20 117:8	sta 26:24
	sides 70:16	socially 62:22	socially 62:22 38:9,15 39:12 40:25 41:15 45:5 55:4 64:4	standards 124:18
	sign 9:24 10:10	solely 149:1	solely 149:1 75:13 113:19 128:3 130:23 175:1 189:7	standing 134:10 202:20,24
	signal 174:15,16	solemnly 8:14	somebody's 206:19 209:10 212:5 213:5	start 35:15 77:1,13 140:7 169:18 197:13,20 199:25
	signature 178:18,19,22	specifically 20:16 44:14 130:5 148:12 149:17 155:11	specifically 20:16 44:14 130:5 148:12 149:17 155:11	started 35:8 36:2 56:21 164:19
	188:12 190:6,10 213:22 214:1	someone's 80:1 103:17,19		starting 7:16 139:22
	signed 157:25 180:15 188:14			starts 106:11
				state 7:15 9:6

61:9,10,12	65:7 91:6	25 120:4,13,23	21:18,22 22:14	69:5 90:25
84:17 158:6	117:21 130:14	121:6,15,23	37:18 38:15	91:24 92:5,9,
178:10	131:1,3,5	123:5,12,13	53:14 84:8	16,19 94:22
statement	191:15 194:19	124:10,16,18	113:24 114:7	96:24 97:1
126:10 144:1	streets 46:20, 21 92:11,12	126:7 128:24 129:7,14 130:8, 14 131:8,11,14	115:2 116:5 117:2 121:16, 22 123:6,12,14,	119:6 130:10 133:3 170:2
states 7:12	strength	132:2,7,23 133:2,15,19,24	22 128:14 133:6,9,12	supervisors 94:5,9,13
19:3,14 25:17	174:15	134:14 140:17 141:1 142:13,	141:22 142:22 161:14	supplemental 30:7
125:24	stress 34:9	21 143:17 144:18 145:25	subject's	supply 26:21
station 86:4	strike 42:15	146:19,22 149:3 150:13	116:19 119:20 120:10 122:8	support 42:1 43:21 211:2
87:4,5 116:5	52:25 90:16	151:8,17	133:11	supposed 129:8 164:25
117:22 124:6	109:11 137:3	152:21 153:7	subjects 37:24 134:22	surveillance 192:13,16 194:14,16,18
129:8,14 130:2	177:7 187:11	156:14 176:18, 21 177:3 205:9	submit 44:14, 17,18 208:12	submitting 44:19
131:14 133:25	strip 19:20	strip-search	115:18,19 116:9 121:14	surveilling 194:19
143:7 159:17,	20:10,25 21:23	121:2	subsection	suspect 208:7
18 176:15,22	22:25 23:3	strip-searched	122:1,8 123:17, 22,25 124:2	suspects 119:11
192:20	39:14 65:16,19	68:19 72:24 76:15 85:11,12	130:2 132:5,6, 9,12,16 133:7	suspicion 115:15
stationed 29:3	66:1,2,4,9,14, 20,23 67:6,12,	146:15 150:15, 21,25	Subsequently	sustain 51:4
31:21	18 68:1,3,9,11, 14,18,24 69:6, 16 71:18,23,24,	strip-	156:12	swear 8:13,14 30:14 191:20
stations 42:18	25 72:1,7,10	searching	substance	swearing 188:21
status 26:2	73:3,10,15,17, 18,22 74:2,9,24	136:5 146:4	89:3	sweater 77:21
142:25	75:18,24 76:2, 10,16,19,20,21	stripped 65:21	sufficient	sweaters 117:7
stay 28:6,25	77:16 78:7,10	stripping 66:2, 5	68:3,13	switch 63:21
60:19,20 170:2	79:9,20,23	strips 84:18	Suite 7:6	swore 189:18
step 171:22	80:10,17,19,22, 23 81:11,15	Stufano 57:2,4	summons	sworn 10:11
stepped 157:7	82:15 83:1,2,5, 12 84:6,14	95:1	124:13	24:13 42:21
steps 151:15	85:6,14,20	stuff 47:3 62:23	supervise	166:22
Steve 12:5	86:2,19,24	66:18 198:18	95:4,13	
88:3 112:10	87:14 90:4,19, 23 92:4,8,15,	213:16	supervising	
122:20 126:14	18,23 93:6,9, 11,15,21 94:2,	subdivided	56:11,13,24 57:9 58:4,11	
143:11 144:25	10,13,17,20,21	42:17	91:6,24 92:24	
152:1 175:9	95:5,14,22	subheading	93:12 94:1,18	
187:23 213:23	96:3,7,10,14,21	113:25	209:5	
Steven 7:24	97:5,14,16,23	subject 15:21	supervision	
75:7 138:10	98:5,10,21 99:6	18:24 20:21	94:22 130:10	
214:12,23	100:1,5,10,15, 20 101:2,14		supervisor	
stop 115:15	102:3,24		57:2 60:2 62:18	
116:10 125:7,	103:11 104:1, 15,25 107:10		66:21,25 68:10	
12 197:12	108:19 109:3			
stopped	114:7 117:5,18,			
150:24	24 118:8,18,22			
stopping	119:5,7,10,18,			
162:18 197:25				
STOPS 199:12,				
22 200:16				
201:13				
street 7:6 31:1				
36:12 49:20				

tabs 208:1	testify 99:12 141:19	thumb 88:2	38:4	trained 36:18 37:1,8,19,22 38:16 39:4,13 84:13,15,23 98:9,11,14 99:5,7 100:5 127:22
tactical 32:9	testifying 11:24 94:17 97:3,4 99:11 123:16 208:14	thumbs 9:23 10:6,9	times 10:17,23 91:9,22 93:8 95:10 97:24 99:10 124:2 146:15 147:20 179:21,22 212:10	
taking 136:14 151:20 170:7 207:2		tied 107:15,16, 17		training 30:6,7 35:25 36:8,20 37:6,11 38:12 39:4,21 40:9 42:2 98:15,19 99:25 100:6,9 128:4
talk 30:12 61:16 80:22 83:25 88:21 138:11 173:6, 25 176:15 196:2	testimony 8:15 79:20 86:9 88:15,18 89:1, 2,3,8 90:3,18 92:17 93:19 94:11 96:13 99:24 122:7 123:11,21 141:20 162:12 166:23 167:11 169:16,18 170:16 171:8 185:12 189:9 204:21,25	ties 117:7	timestamp 197:21 198:6 199:23,25	trains 206:21
talked 136:14		time 7:8 13:6 17:16,20 19:21 20:11 21:4,12 22:1,4,23 25:9 26:24 27:13,14, 17,19 28:3,4 29:1 31:24 32:16 33:7,8, 14,16,24,25 35:20 36:4,9, 16,22 37:2,17 40:19,24 41:4, 5,8 43:23 45:20,22 46:13 47:7 49:6,25 53:23 54:10,14, 20,22 55:15,16 56:15 57:11,21 59:17 60:16,20 61:23 62:14,16 64:4 73:14 78:4	today 7:7 9:18 12:3,12,17 15:23,24 16:25 18:9,24,25 19:12 23:7 38:14 40:6 53:6 79:20 81:14 99:12 113:10 127:15 139:14, 15 141:14 142:16 144:7 146:3 161:17 163:8 167:17, 25 168:14 169:2 175:6,25 176:11 178:15 201:20 204:21	transcript 35:1
tape 170:6 203:8 205:14	text 148:1 174:2,5,7,8,10	there'd 137:19 138:2	titled 140:7	transfer 32:19 34:4 46:13 54:9 87:24
taps 194:16		thigh 107:25 125:2,18	today 7:7 9:18 12:3,12,17 15:23,24 16:25 18:9,24,25 19:12 23:7 38:14 40:6 53:6 79:20 81:14 99:12 113:10 127:15 139:14, 15 141:14 142:16 144:7 146:3 161:17 163:8 167:17, 25 168:14 169:2 175:6,25 176:11 178:15 201:20 204:21	transferred 41:18 184:25
target 210:6,18		thighs 107:16		transferring 37:10
task 31:25 32:1,3,18 193:12		thing 9:9 10:12 28:22 69:5 70:17 91:14	transfers 36:23	
tasked 32:5		things 19:19 20:8 47:4	transition 27:25 28:4	
taught 38:22		100:22 199:16		
technical 198:18		206:18		transpired 176:9 185:11
technician 7:4		thinking 105:21		transport 129:13 186:22 187:8
technology 9:5 201:7		139:13 140:25		transported 185:16 186:9
ten 95:18		147:21 150:24		transporting 186:14
Ten-codes 38:18		151:4 160:1		travel 91:10
terms 66:3 104:5,6		164:4,12,25		Tremel 144:23, 24 145:3 152:9, 10,11,12,15,22 153:19
Terrell 144:22		165:10 168:7		
test 34:16 48:7, 9,12,13,14,15		169:6,12,23		
testified 11:20 13:13 28:17 68:21 69:15 70:23 101:3 120:22 121:1 161:17 201:18		170:3,24 173:7,		
		11 179:2,5,8,		
		10,11,21 180:1,		
		13 182:21		
		191:18 192:12		
		202:12 207:24		
		208:15 213:21,		
		22 215:1		
		throw 207:20		
		timeframe		
			touch 78:9 120:10	
			touched 79:8	
			tour 26:8,9,10	
			tour s 26:4	
			Town 51:18	
			trading	
			trials 11:22	
			trip 143:6	

trouble 199:16	137:9 180:9	164:6,12,20 180:13 194:1,3 209:4 211:3 212:17	varies 100:19, 24 104:18	12,15 106:20 118:23 140:8 211:3
truck 27:5,7	understanding 20:19 22:19 64:20 65:13 66:4,8 68:24 69:18,21,23 70:4,6,11,19 71:1 89:9,12,22 129:7,11 152:15 157:21 158:12 164:15 166:21 183:6	United 7:12 19:3,14 25:17 units 48:23 212:14 unlawful 19:20 20:10,25 21:23 23:2 140:17 142:13 144:18 145:11,12,25	vehicle 211:25 212:1 vehicles 212:3,22 verbal 10:15, 16 34:24,25 35:2 136:18	vests 117:7 video 7:4,9 9:24 14:21,22, 23,24 15:1,2,3, 4,5,6,7,9,10,13, 19 16:2,4,12, 16,21 18:9 85:25 86:8,10, 14,15,20,22 verbatim 87:2,8,9 115:8 verify 151:11, 15 Vernon 11:5, 11,21 19:4,15 20:4,10,14 21:1 22:22 23:24 24:10,14 25:3,7 33:1,4,9,21 34:13 35:8,11, 16 36:2,6,7 37:2,3,12,14, 19,23 38:3,9, 10,11,16,22 39:2,3 41:1,16, 23 42:7,9,16,22 upper 31:23 125:2 upstairs 190:4 utilize 193:5 utilized 119:10 156:11 utilizing 191:23 210:19, 23 uttermost 120:6
turned 186:5	underwear 71:20 78:5	upcoming 141:22	utilized 119:10 156:11 utilizing 191:23 210:19, 23 uttermost 120:6	video/audio 133:6 videos 16:19 videotape 203:25 204:17 205:11 206:8 view 73:21 74:25 92:11 201:16 206:11 viewed 168:15 Vincent 39:24, 25 40:17 57:2,3 95:1 Vinny 57:2 violence 119:21 violent 102:22 119:20,21 virtually 8:6 virus 46:23 visual 71:22
turn 85:17 117:25 132:3 139:17	underwears 77:20	V 81:16 83:2,6,13 84:13 90:5,20, 24 92:14 95:22 vacation 17:7 vagina 70:21 Vaguely 152:13 Valente 63:15, 17,18,19 136:24 164:2 185:3 203:1 Valenti 203:2 validates 190:11 varied 55:11	varying 100:19 101:11 102:10 103:11 104:11 105:11 106:11 107:17,19 underneath 107:17,19 understand 9:10 70:3 75:22 103:16 104:11 122:21 125:15	12,15 106:20 118:23 140:8 211:3 vests 117:7 video 7:4,9 9:24 14:21,22, 23,24 15:1,2,3, 4,5,6,7,9,10,13, 19 16:2,4,12, 16,21 18:9 85:25 86:8,10, 14,15,20,22 verbatim 87:2,8,9 115:8 verify 151:11, 15 Vernon 11:5, 11,21 19:4,15 20:4,10,14 21:1 22:22 23:24 24:10,14 25:3,7 33:1,4,9,21 34:13 35:8,11, 16 36:2,6,7 37:2,3,12,14, 19,23 38:3,9, 10,11,16,22 39:2,3 41:1,16, 23 42:7,9,16,22 upper 31:23 125:2 upstairs 190:4 utilize 193:5 utilized 119:10 156:11 utilizing 191:23 210:19, 23 uttermost 120:6
U		V 81:16 83:2,6,13 84:13 90:5,20, 24 92:14 95:22 vacation 17:7 vagina 70:21 Vaguely 152:13 Valente 63:15, 17,18,19 136:24 164:2 185:3 203:1 Valenti 203:2 validates 190:11 varied 55:11	varying 100:19 101:11 102:10 103:11 104:11 105:11 106:11 107:17,19 underneath 107:17,19 understand 9:10 70:3 75:22 103:16 104:11 122:21 125:15	12,15 106:20 118:23 140:8 211:3 vests 117:7 video 7:4,9 9:24 14:21,22, 23,24 15:1,2,3, 4,5,6,7,9,10,13, 19 16:2,4,12, 16,21 18:9 85:25 86:8,10, 14,15,20,22 verbatim 87:2,8,9 115:8 verify 151:11, 15 Vernon 11:5, 11,21 19:4,15 20:4,10,14 21:1 22:22 23:24 24:10,14 25:3,7 33:1,4,9,21 34:13 35:8,11, 16 36:2,6,7 37:2,3,12,14, 19,23 38:3,9, 10,11,16,22 39:2,3 41:1,16, 23 42:7,9,16,22 upper 31:23 125:2 upstairs 190:4 utilize 193:5 utilized 119:10 156:11 utilizing 191:23 210:19, 23 uttermost 120:6
Uh-huh 109:24 189:6				
unclothed 73:23 74:24				
underclothing 119:13				
undercover 156:10,11 183:13 191:23, 24 192:4,6,10, 12 193:5 194:14 195:4 210:20 211:1				
underneath 107:17,19				
understand 9:10 70:3 75:22 103:16 104:11 122:21 125:15				

72:5 74:8 75:2	187:13,17	west 7:6 31:22, 23	198:24 199:3,9 200:1,20 209:8	52:17 54:6 58:13 61:6
86:13 110:10	188:9,22,23	Westchester	worked 48:22 57:14 61:24 62:8,15,16 95:1,9 96:15 137:18 147:18	yielded 182:11
111:10	189:10 191:10		162:3 174:16, 18 198:18 208:22 211:16	York 7:13 8:2,7 24:2,8,18,21 25:6 26:15 28:6 29:1,20 30:13 31:9 32:17,22, 24 33:10,17 34:19 35:4,21
visually 78:20	192:23 203:7	warrants	188:10 193:16, 17	51:19 61:11 96:6,16 98:20
79:6 80:7,8	204:23 205:4,8, 10 207:5		working 26:23 45:9 60:24 61:20 128:10 137:21,22 173:10,23 174:15 192:19	99:7 100:2 178:10
voice 15:11	80:15 81:9	White 8:2,7	200:14	you- 27:24
198:1,8 199:17, 18 202:7 206:7	130:5 162:5	who've 123:17	works 198:11 199:3 200:12	younger 34:7
Volunteers	163:5 205:7	wife 157:13,18	worries 178:2	
155:21		wigs 117:7	worry 106:10	zones 32:6
W		Williamson	would've	Zoom 8:2 9:1, 4,25 10:16 139:3 166:4
W.B. 26:17,19, 20,21,23 27:3,6		144:20,22,24 145:4 152:9,10, 11,12,15,22 153:5,20	35:18 205:13	
waist 74:7,23		winter 54:6,7	write 182:10 207:25 208:3	
75:1 80:3,6,8		wire 194:15,17	writes 182:23	
108:25		wires 194:15	writing 175:12	
waist-side	weapon-wise	witness' 75:17	written 156:23	
108:23	107:14	witnesses	157:1,10,25 158:14 160:24, 25 183:4	
waistband	weapons	134:21	wrong 190:20	
115:4 125:1,18	66:13 68:16 76:3 77:12	woman 203:23	wrote 13:19 30:14 184:13 185:2,11	
wait 28:21	79:17 84:21	women 184:5 203:3,13,15,19		
waiting 27:10	101:24 102:4,9, 12 106:12	words 43:21 66:15 77:7		
28:23 165:23	107:15,16,17, 22,23,25 108:4, 7,10,14,16,18	work 11:5,7,8, 10,21 18:23	Y	
188:6 196:6,9, 12	114:24 115:3 116:21 119:11	23:24 24:10 26:14 32:17	year 12:21 27:16 29:24 45:6,8,24,25	
waive 35:22	124:17 125:25	43:1 56:18 57:3,17 58:5	56:21 58:6 59:25 60:10	
walked 202:14	131:7 146:18	59:11,16 61:2 62:5,20,23,25	147:24 159:10, 11	
wall 182:13		63:6 137:24 138:1 158:18	years 24:25 25:21,22,23,24, 25 49:1,19,23	
wallets 117:8		165:1 174:11 195:17 197:14		
wanted 27:25				
46:16 88:20				
173:3,18				
190:25				
wanting 90:17				
war 28:3				
warrant 81:12				
111:19,21				
112:4 130:7,19				
131:12 153:6				
161:24 165:14,				
22 166:23				
167:2,5,6,7,13,				
14 168:1,8				
171:8 173:5				
179:14 180:15				